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Ms. Wendy R. Dixon, EIS Project Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
P.O. Box 30307, M/S 010
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Dear Ms. Dixon:

I would appreciate having these comments included in the official record of citizen response to the Draft Environmental Impact Statement for a Geological Repository for the Disposal of Spent Nuclear Fuel and High-Level Waste at Yucca Mountain, Nye County, Nevada.

- 1... I think the DEIS fails in that it offers only an unprecedented single alternative to the proposed action of operating the Yucca Mtn Nuclear Waste Storage Facility. The No Action Alternative is very likely unacceptable, a straw man to be shot down, to leave us with the single remaining alternative, the Yucca Site. It is my understanding that the Nuclear Waste Policy Act, as amended in 1987, did not preclude other alternatives, only making their inclusion unnecessary. It appears to me this was simply to assure the Yucca site being chosen.
- 2... I spent 25 years of my career as a government meteorologist assigned to the Nevada Test Site nuclear underground testing program in the period from the 1960s through early 1980s. One thing that impressed me about the underground testing program was the difficulty in assuring against ventings of nuclear materials during tests. Despite every apparent effort at containment, there were unexpected prompt massive ventings at the time of certain nuclear experiments that more than once literally shut down the test program for months while better containment procedures and models were developed to try and avoid the unexpected geological and hydrological situations and the shortcomings in test hole backfill procedures that were felt lead to these accidental releases.

2 cont. The lesson from this as applied to a 10,000 year isolation problem is that mother nature and human shortcomings in methodology will almost certainly deliver up surprises that will result in serious problems of non-containment sometime in the 10,000 year life of the project.

Meteorological predictions have their limitations, but geological predictions have far, far greater prediction uncertainties.

The sad thing about this 10,000 year project is that future generations, perhaps those well beyond the duration of unpredictable civilization changes that have occurred throughout all history since the birth of Christianity, will likely have to contend with these problems. It's anyone's guess as to how well these future generations, these future political systems, future cultures, future population sizes, future densities of population near the storage facility, will be able to cope.

1 cont. Given the geological uncertainties, it appears to me undesirable that all of the proposed nuclear waste be stored in one place, even if Yucca Mtn were to be chosen one of the sites. But this EIS assures that all our "eggs" are in one basket; all could be broken in a single accident at one single place-- Yucca Mtn.

3 This DEIS also gives the citizens of unspecified cities and towns no suitable opportunity to comment on a transportation hazard analysis affecting them. Again, the uncertainty principle applies to accident possibilities spread over decades in time and over the miles of transportation involved as waste from many states homes in on Yucca Mtn. Admittedly, the cost of holding public hearings around the country would be expensive, but a pittance in proportion to the total cost of the Yucca Mountain studies already completed and forthcoming.

Thanks for this opportunity to comment on the serious problems I perceive with this DEIS.



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