1 February, 2000

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EIS001194

Ms. Wendy Dixon,
E I S Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Mngt.
U.S. Department of Energy - M/S 010
P.O. Box 30307
North Las Vegas, NV 89036

RECEIVED
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RE: Draft Environmental Impact Statement for a geological repository for the disposition of spent nuclear fuel and high-level radioactive waste at Yucca Mnt., Nye County, Nevada

Dear Ms. Dixon:

1 As an engineer, I was deeply troubled not so much by what was revealed in the **fact sheets** and **policy briefs** concerning the proposed transit route for commercial nuclear waste, but by what they surreptitiously attempted to obscure. Combing through this public relations hype, I was given over to the impression that legal jargon had been substituted for much more precise scientific notation. An example would be the suffix **"person-rems"**, which appears in this literature. Were this term intended to indicate the approximate quantity of rems per total number of individuals within a contaminated perimeter, it would - when applied to a population center with a concentration as dense as that of Cleveland - denote a radiation hazard many times in excess of that which Hiroshima suffered in August of 1945. If instead the term is more properly interpreted as the average rem dosage to which any individual within a certain proximity might be exposed, the figure, while remaining unacceptably high, becomes indicative of a contamination level significantly less catastrophic than the aforementioned. I have an suspicion, however, that the term was coined to designate not quite one nor exactly the other.

2 Somewhat less ambiguous, yet no more reassuring, are the packaging standards. Here, both materials and minimum dimensions are never specified. This in consideration, the design criteria presented nonetheless appear woefully inadequate. The performance parameters outlined could likely be satisfied by any off-the-shelf, tin garbage can.

3 ... Further cited in the attendant reports to this Environmental Impact Statement is a survey by the Nuclear Energy Institute. According to this study, out of twenty-nine hundred (2900) shipments of nuclear material monitored by the Institute, a total of fifty-nine (59) accidents were reported. The severity of these accidents was not expressly clear, though when discussing the transportation of highly radioactive substances through populated areas, a single

3 accident of any magnitude constitutes an unacceptably high figure. And yet, they are inevitable. By close comparison, an individual inextricably placed in the path of a raging stampede of no less than twenty-nine hundred bull elephants, who in their passing sustains trampling by a mere fifty-nine members of the herd, can **not** be said to have fared 'pretty darned well'.

4 Rather than store spent nuclear fuel in a Nevada salt cavern, it might prove less hazardous and more cost effective to load the stuff atop an old **'Saturn 5'** booster and blast it into the sun. We would still have that pesky transportation problem, however. Perhaps it would be best therefore, to simply bury nuclear waste on site. A public outcry against such practice could easily be prevented by buying up all housing within a reasonable proximity to the facility, then selling it off to the families of power plant owners, their lobbyists, politicians eager to support their programs, and all the so called **"experts"** who keep trying to sell us on the addle headed notion that, in their hands, atomic waste is safer than baby powder. This solution may also prove more cost effective than shipping the waste cross-country to a hollowed-out mountain. While quite sure that your office would dismiss this suggestion out-of-hand, I am just as certain your position there would be wholly untenable.

Cordially,

Tom

Tom