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EIS001946

# Rocky Mountain Peace and Justice Center

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February 29, 2000

To: Ms. Wendy R. Dixon, EIS Project Manager, Yucca Mountain Characterization Office,  
OCRWM

From: Tom Marshall, RMPJC

Date: February 29, 2000

Following, please find RMPJC's comments on the "Yucca Mountain EIS." You may recall that yesterday I informed you that the advertised toll free fax number was not working. I tried to fax to the Nevada office (to the number you provided). This morning I learned that the fax did not transmit properly. Hopefully this transmission will work. I hope that these comments will be included in the official record which closed on 2/28/2000. Please let us know if this is not the case.

Sincerely,  
Tom Marshall

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### Comments on the Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High Level Waste at Yucca Mountain

Submitted by the Rocky Mountain Peace and Justice Center  
Tom Marshall, Program Coordinator  
February 28, 2000

The Rocky Mountain Peace and Justice Center is non-profit, public interest organization located in Boulder, Colorado. We have worked on issues pertaining to nuclear waste management since 1983, and represent members throughout Colorado and beyond. We are pleased to be able to provide comments on the Draft Environmental Impact Statement for a Geologic Repository for the disposal of Spent Nuclear Fuel and High Level Waste at Yucca Mountain (DEIS). These comments supplement those presented at the Public Hearing on the DEIS in Denver, November 16, 1999.

- 1 [The Rocky Mountain Peace and Justice Center has been and remains opposed to the Yucca Mountain project. Burial of high level nuclear waste at Yucca Mountain endangers the environment, and the health of current and future generations. Transportation of high level nuclear waste to the Yucca Mountain site endangers as many as 50 million people in 43 states.]
- 2 Our review of the DEIS confirms these concerns. [We believe that the DEIS contains fundamental flaws that warrant reissuance of the DEIS.]

#### Transportation

- 3 [The DEIS inadequately examines and characterizes the impacts and risks of shipping high level nuclear wastes to Yucca Mountain. According to the DEIS:

DOE believes that the EIS provides the information necessary to make decisions regarding the basic approaches (for example, mostly rail or mostly truck shipments), as well as the choice among transportation corridors. (6-1)

However, the DEIS provides no route specific analysis. How can DOE adequately understand the impacts of transporting high level nuclear waste throughout the nation without understanding route specific conditions? One of the likely transportation routes is I-70 through Colorado. This route goes through the city of Denver and through the Rocky Mountains in Colorado. It is imperative that DOE understand the challenges and dangers of these routes before making its route selection, and that the public be able to comment on the proposed routes. As transportation to the proposed repository is an integral piece of the entire program, it is important that this be analyzed in the context of the DEIS.

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- 4 [ The State of Nevada estimates that between 12,000 and 35,000 shipments may travel along I-70 through Colorado. This is in addition to 28,000 shipments of plutonium contaminated waste traveling through Colorado and Denver on I-25 to WIPP over a thirty year period. The DEIS fails to analyze the combined risk of shipments of both waste streams.
- 5 [ The DEIS does not adequately analyze the impacts of an accident in Denver or in mountainous areas. What would be the impact of a radiation release during rush hour in Denver? What would be the response time? What would be the impact in remote mountainous areas? Colorado is a state that relies heavily on tourism. The DEIS does not analyze the socioeconomic impacts of an accident or the socioeconomic impacts of the very fact of nuclear waste shipments through Colorado.]
- 6 [
- 7 [ At this point there does not exist an actual, approved shipping container for the DEIS or the public to analyze. It is impossible to adequately understand the impacts of transportation without knowing the design and capabilities of an actual container. Computer tests of a conceptual design on a computer are not adequate.

#### Yucca Mountain

- 8 [ There are numerous technical concerns regarding Yucca Mountain: numerous earthquake faults run through the site; volcanic activity in the region may occur well before the end of the dangerous life of the waste; there is potential for water to move contamination out of the site and for the water table to back up into the repository; and the presence of mineral resources could result in human intrusion into the repository. Significant scientific uncertainty surrounds these issues. None are adequately explored in the DEIS.
- 9 [
- 10 [

#### No Action Alternative

- 11 [ The two scenarios examined for the no action alternative are not credible. To suggest that the only options at this point are continued storage at the current sites (with or without institutional controls) or disposal at Yucca Mountain is shortsighted and irresponsible. A revised DEIS should include other plausible scenarios.

#### Environmental Justice

- 12... [ Disposal of high level nuclear waste at Yucca Mountain is an environmental justice issue. Yucca Mountain is on land that the Western Shoshone, Southern Paiute, and Owens Valley Paiute and Shoshone peoples consider sacred. The DEIS does not adequately explore this issue. Essentially, DOE has done nothing more than acknowledge that the concern exists. This is not acceptable. Transportation of waste to Nevada will impact people of color and economically disadvantaged communities along highways and rail lines. A more detailed route analysis should be conducted to determine the extent to which people of color and economically disadvantaged communities would be impacted by transportation to Yucca Mountain.]
- 13 [

12 cont. Thank you for the opportunity comment on the DEIS. Again, we believe that the DEIS is fundamentally flawed. [ Either Yucca Mountain should be withdrawn from consideration as a

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12 cont. repository for high level nuclear waste or that the DEIS should be redone to correct the inadequate and insufficient nature of the study.