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EIS002188

Mineral County's Statement to the
Department of Energy's (DOE's)
Draft Environmental Impact Statement (DEIS)
for Yucca Mountain (December 1 & 2, 1999)
— Carson City

1 #4. Mineral County believes that:

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- The radioactive waste should not be buried because there is no way mankind can predict what will happen in the future. Alternative ways should be studied so technology can find a way to reuse this radioactive waste. Burying something as deadly as radioactive waste does not solve any problems. If anything it might create more problems. (and)

2 ~~b. Transporting highly radioactive waste through 43 states is not prudent. Why would anyone want to endanger the public and environment along these routes.~~

* #1. Mineral County believes that a number of issues are not addressed properly, not addressed adequately, or not addressed at all in the Draft DEIS. These issues include but are not limited to:

3... a. Impacts on local government programs and costs - The DEIS does not adequately address specific

17... community, statewide, and regional impacts. Rural counties do not have money to handle a radioactive accident. The cost to ensure that the rural counties would be able to accommodate the transportation of the radioactive waste, would probably exceed the no-action alternative.

4 b. Uncertainty in models and data used for site characterization and repository performance. Mineral County's flood plain map is incorrect. If this is so, how reliable is the information gathered for Yucca Mountain and other areas? The flood plain report in the DEIS is too generalized. Mineral County would like to have a detailed flood plain analysis done of Yucca Mountain and each affected county.

5 c. Unreasonable "No-action" alternatives - Two no-actions alternatives were provided. One would have the radioactive waste stay where it is under institutional control for just 100 years. The second would have the waste stay under institution control for 10,000 years. DOE acknowledges that neither is likely to occur but says that other scenarios would be too speculative. Mineral County would like to have reasonable alternatives analyzed & included in the EIS.

6 d. Cumulative impacts (low-level radioactive waste shipments to and storage at the Nevada Test Site).

7 ** e. The DEIS provides a "generic" transportation analysis. Specific transcontinental routes and communities along the way are not identified. Other transportation issues of the waste to the site are:

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- Mode - not clearly identified. Three possible modes of transportation are identified.
  - The waste could be driven on interstates using legal-weight trucks.
  - It could be sent by train which includes five options of building a railroad to Yucca Mountain (YM).
  - It could be transported by "Heavy Haul" which is rail to a transfer point in Nevada, then transferred to 200-foot heavy-haul trucks and transported to YM.

9 * Routing - many possible routes, none studied adequately. Rural areas do not have good or safe roads to transport this nuclear waste, especially, if alternative routes are selected; nor do they have railroads to get it to Yucca Mountain.

10 * Land use consideration of present and planned land uses along possible routes identified.

*Repeat this "Intro" at the beginning of comments 3-6
**Repeat this "Intro" at the beginning of comments 8, 9, 10, 11, 12, and 13

17 cont'd. * Emergency Response - training, preparedness and funding. Rural areas do not have the necessary equipment, nor trained personnel to handle a radioactive accident.

11 * Terrorist/extremist threats - DOE has used old data to provide this information.

12 * Casks - DOE will change the design of the casks which would be used to transport the High-Level Radioactive Waste. The DEIS does not address whether the new design of the casks has been analyzed. Have these new casks been built and tested? What is the integrity of the valves and seals? Full scale cask testing is needed rather than computer simulations.

13 * Weather - although weather does not seem to be an issue. Mineral County believes it is a big issue. Most of the radioactive waste would be transported through the northern part of Nevada. This part of the state may have bad weather from November to May as well as many other states from east, central, and northwest America (see Figures S-10 or S-11, attached). Will the radioactive waste be transported during this time frame? The DEIS does not have adequate information in case of road closures due to inclement weather nor provide complete information about safe havens.

14 Mineral County wants it put on record that the Draft Environmental Impact Statement is inadequate with regard to addressing transportation. The DEIS should provide feasibility studies and impacts, and a comprehensive and thorough analysis of modes and specific routes. Transporting highly radioactive waste through 43 states (possibly affecting about 53 million people) is not prudent and would endanger the public and environment along these routes.

15 #2. The cost of clean up at the Nevada Test Site, cost to build new routes (rail or roads), and cost to clean up a radioactive accident would probably far exceed finding alternative ways to reuse this radioactive waste.

16 #3. Mineral County wants it put on record that a "health assessment" (at the cost of DOE) should be done now of all the affected counties. This assessment would reflect what is out there now. By showing the present health situations now, a case may be made for *not* adding to a potential number of latent cancer fatalities, and for documenting current health conditions prior to a radioactive waste accident.

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Mineral County will be submitting more detailed and additional comments by the Feb 9th comment deadline.

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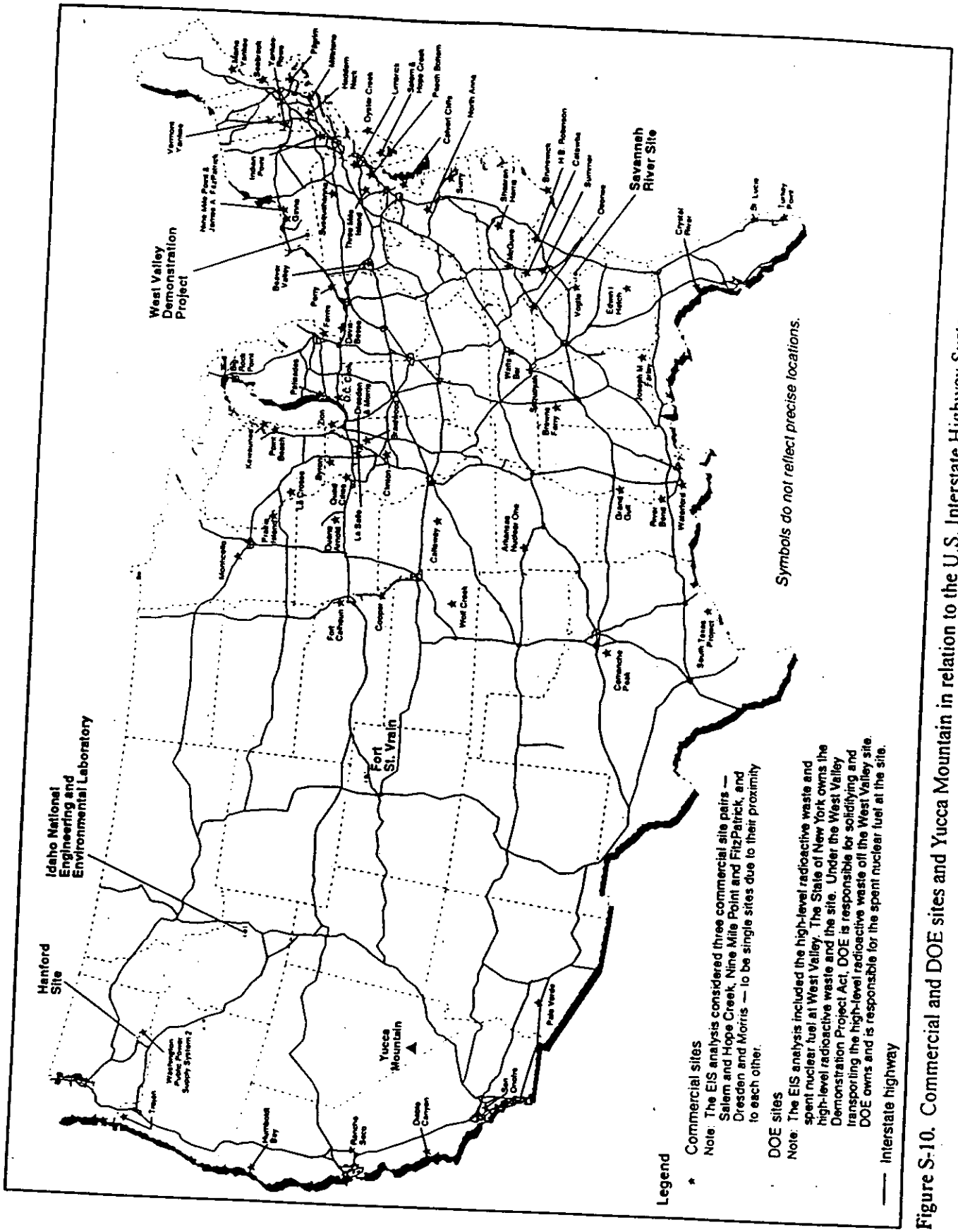

Figure S-10. Commercial and DOE sites and Yucca Mountain in relation to the U.S. Interstate Highway System.

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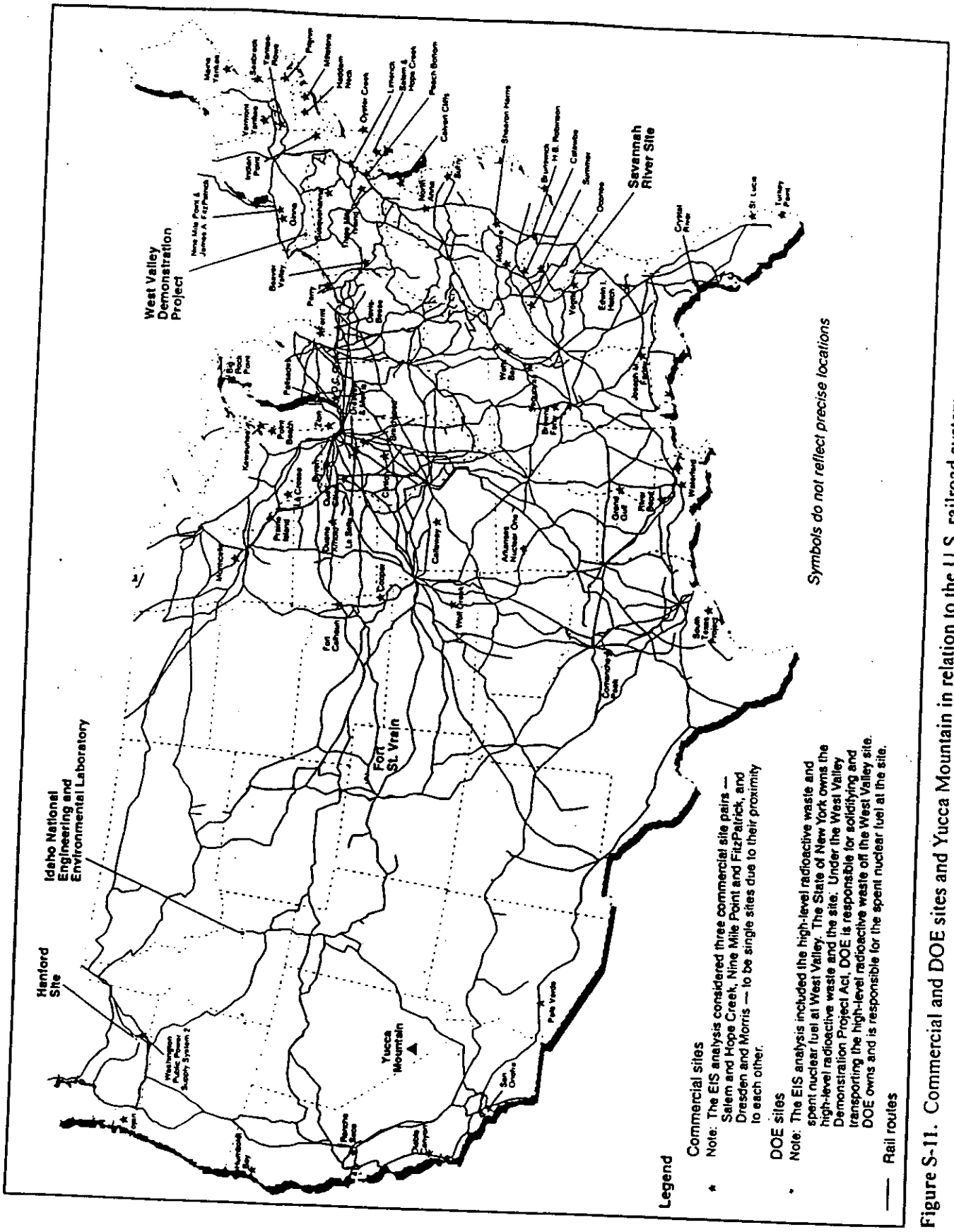

Figure S-11. Commercial and DOE sites and Yucca Mountain in relation to the U.S. railroad system.

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