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July 6, 2001

Dr. Jane Summerson, EIS Document Manager, M/S  
U.S. Dept. of Energy  
Office of Civilian Radioactive Waste Management  
Yucca Mountain Site characterization Office  
P.O. Box 30307  
North Las Vegas, Nevada 89036-0307

Re: Supplement to the Draft Environmental Impact Statement for Yucca Mountain

Dear Dr. Summerson:

1 Your Supplemental EIR fails to address the important issue concerning Transportation of Nuclear Waste all over the country, exposing 52 million Americans who live within 1/2 mile of the routes to ionizing radiation and the resulting cancers, mutations, and other reproductive problems.

By transporting nuclear waste through the arteries of our nation you are subjecting our population to the known risk of poisoning our earth, air, and water.

I incorporate here by reference comments submitted by me previously, i.e., **“MAINLINING NUCLEAR WASTE INTO THE VEINS OF AMERICA”** submitted February 9, 2000; and comments concerning **“INTERMODAL TRANSPORTATION OF ‘LOW-LEVEL’ RADIOACTIVE WASTE TO THE NEVADA TEST SITE”** submitted on January 30, 1999. These incorporated comments apply even more to this new “supplemental” draft E.I.R. for the “Disposal” of Spent Nuclear Fuel and High Level Waste at Yucca Mountain.

2 There is no such thing as “disposal.” You are just going to move the waste around and put it at a place known to be subject to earthquakes, near the Amargosa River, in a facility where leakage is planned and inevitable, to store for a period of time impossible to monitor. It will cost billions of dollars of taxpayer money—money that will profit the very companies who made the waste already profiting, and  
3 should be responsible to clean up their own mess, or not to create it. Those  
4 companies making the waste should keep it if it is not safe where they create it, they should cease creating it. |

5 | You have no fund to pay my offspring for the illness or death these stupid lethal decisions will inevitably cause. |

U.S. Enrichment Corporation established by Congress to sell enriched uranium at home and abroad for the purpose of "maximizing profits", and then turned over to private companies a couple years ago is illegal and should be dismantled.

Instead, it is operating covertly and creating millions of dollars of profits for irresponsible companies such as UNOCAL/TOSCO and others. Unocal is being allowed in San Bernardino County to operate **a plastic-lined nuclear dump**, at the very place where its MolyCorp Mines spilt radioactive waste down both sides of Clark's Mountain, never cleaned up the waste which polluted earth, air and water, and never obtained an Environmental Impact Report. Instead, the federal government just transferred to the private property owner the federal land Unocal had polluted. That brought the project, allegedly, under the jurisdiction of the County of San Bernardino, which corrupt Board of Supervisors allowed resumption of nuclear waste dumping in plastic lined ponds, with only a negative declaration. The federal government, instead of having to prosecute the polluter with whom it was in contractual relationship, was thus spared the necessity of prosecuting Unocal, which was likely illegally processing uranium at the site. PLEASE CLOSE DOWN MOLYCORP'S PLASTIC LINED NUCLEAR DUMP.

THE GOVERNMENT WHICH PROFITS FROM MANUFACTURE AND SALE OF NUCLEAR WEAPONS AND POWER WHILE POISONING ITS PEOPLE

IS NOT THE FRIEND OF THE PEOPLE.

*PLEASE SELECT THE NO-ACTION ALTERNATIVE.*

*DON'T SPREAD NUCLEAR WASTE THROUGHOUT OUR COMMUNITIES.*

LEAVE IT WHERE IT IS. AND STOP MAKING NUCLEAR WASTE

**NOW!**

*Mayoull M. Nichols*

**Marjorie Musser Mikels**

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010315

January 30, 1999

U.S. Department of Energy  
Nevada Operations Office  
Attn.: Michael Skougard  
232 Energy Way  
North Las Vegas, NV 89030

Re: INTERMODAL TRANSPORTATION OF "LOW-LEVEL"  
RADIOACTIVE WASTE TO THE NEVADA TEST SITE  
Pre-Approval Draft Environmental Assessment

Dear Sirs:

On behalf of myself, thousands of people who signed petitions in our county indicating they do NOT want radioactive waste here in San Bernardino County, (most of whom do not know about this "Environmental Assessment") and on behalf of those without a political voice, our children and future generations of our offspring:

I object to the Department of Energy's hiding behind the "commerce clause" in a silly attempt to limit liability for poisoning millions of American citizens who travel our highways and live in close proximity to our rails who are being exposed to unnecessary risk from ionizing radiation. I object to your hired public relations staff telling our citizens the department has "no power" to direct the transporters and generators with regard to routes and methods of transport of cancer-causing waste.

The people give our government power to protect our health and safety, not to use our tax dollars to insure the profits of the waste producers, whom you choose to call "stakeholders". If you continue creating more nuclear weapons, (allegedly to defend us from foreign terrors, but in reality assuring private weapons manufacturing companies and nuclear power generators continued unparalleled profits), then you must protect our health and safety. Those who create this peril

to our lives, including the United States Government and its contractors, must assume the liability. That calls for safety planning in advance of any shipments, including full disclosure to ALL the citizens who could be exposed. People have a right to know that radioactive Strontium 90 from Oak Ridge, Tennessee will be transported on this road or this rail at these times—so people have the option of EVACUATION, and expressing their outrage at the ballot box. But that is not how this department of our government is handling the matter. The history of the nuclear program in this country demonstrates a pattern of stealthily laying hazards on an unsuspecting population, in the name of “national defense”. When the victims contract leukemia and other cancers two to fifty years later, the resources of their own government are used to obfuscate, delete, hide, and falsify evidence to defend against claims brought by the affected families. This is justified by the fear tactic that if the word actually gets out as to how many of our population are being sickened and killed by radiation, our “classified/top secret” nuclear programs (so “important to our national security”) will be threatened.

Perhaps such an argument had appeal back in the days of Truman and Eisenhower when Japan, Germany, or Russia struck terror that democracy and the “free” world could be devastated if we did not win the “arms race”. But today? Why must Lockheed Martin be allowed to put nuclear weapons in space that can hit targets on earth with pinpoint accuracy in seconds, at our expense? Why has Congress passed laws establishing U.S. Enrichment Corporation with the express statutory purpose of maximizing profits by selling enriched uranium to markets both domestic and FOREIGN, at the same time the government spreads fear that rogue country terrorists will get their hands on it? This question is especially pertinent in light of statutory intent to privatize U.S. Enrichment corporation, so persons with only a profit motive are holding substances for sale which those rogue countries need for nuclear weapons. Hello, is anybody home up there on Capital Hill?

All of this is prefatory to the question before us today: Why is the Department of Energy putting thousands of tons of nuclear waste on our highways and rails and shipping it all the way across the country to the Nevada Test Site and why are they “suggesting” their generators and shippers take the long route through San Bernardino County, instead of the direct shorter routes through Nevada?

The D.O.E.’s answer is quite direct. We’ve gotta put it somewhere, and Las Vegas doesn’t want it to go through their town. This translates into: Las Vegas, Nevada, and Clark County have more money and political clout than “Needless”, California, and San Berdump County does.

(**National News Flash!** The U.S. Senate is now engaged in the important debate about whether they should be allowed to ask Monica next week what color her panties really were, where she got the cigar, and precisely how it felt when the dress was stained. More about this important news development after these important commercial announcements.)

The Energy Department was very careful to inform people who attended the **UNADVERTIZED, UNANNOUNCED**, two public meetings in San Bernardino County concerning this plan that these were **not** public hearings. A hearing would mean someone might have to listen to you, or that there was an environmental impact statement required, and comments would be published and responses generated. Oh no, the only E.I.S. required was done a long time ago, pertained to storage of waste at the Nevada Test Site. Of course, routes through San Bernardino County were not contemplated then, so our people had no notice, hearings nor public comment afforded.

Indeed, it was almost a miracle any citizens of San Bernardino learned of the Environmental Assessment being circulated on the proposal to direct Energy's deadly waste from the East Coast across our highways. Had representatives from People Against Radioactive Dumping (PARAD) not attended the November, 1998, joint meeting of the Dept. of Energy and Lockheed Martin, and their "stakeholders", it is doubtful the press, the City of Needles or the County of San Bernardino would have learned of this ridiculous plan. (The circulation list shows a copy to Valerie Pilmer, Planning Director, but we all know District Attorney, Dennis Stout and the Grand Jury have kept her busy with indictments over Rail Cycle—our version of the Monica diversion. A copy went to Leon Berger, who used to be the Needles City Manager, but who hasn't been an employee or resident of that town for several years. And a copy went to Katie Yent, Mayor of Barstow. But Katie is married to Judge Rufus Yent, the hanging judge of the desert, who has repeatedly made heinous rulings, incarcerating and inflicting great terror on those who spoke out against the Ward Valley Nuclear Dump. While some may beg to differ (and I will keep an open mind), perhaps Mayor Yent put up a loud enough voice to fool her electors, while drawing enough attention to her city, destined to be the "intermodal" hub, to get some added grease into the palms of her city fathers in exchange for their great cooperation and patriotism.

While it grieves me to say it, such may also be the strategy of the County Board of Supervisors, who, while vocally opposed to both rail and truck transport of east coast D.O.E. waste traversing our county, did add language to their fair statement that was not discussed publicly at the board meeting, i.e., "establish financial

resources". Big glittering Vegas can probably come on real nice when cooperation is requested. We know Las Vegas is already contributing money to the upgrade of that horribly dangerous stretch of road, on which the nuke trucks will drive right along side ma, pop, and the kids. We will be watching to see whether the Board of Supervisors, (who are allowed to have a quorum of their body on SanBag) will put this issue on the agenda of the San Bernardino Associated Governments to allow all the cities to have a say. We will be watching to see how much effort we get from our locally-elected state legislators. Will Leonard, and Bruelte, and Baca, and Longville, and Olberg, just tag along with Jerry Lewis, and George Brown and David Drier—the hear-no-evil, see-no-evil, do-no-evil trio?

**(International News Flash!** President Clinton is real sad that all those women and children had to get blown up when our military blasted Iraq with missiles the other day. Shucks, they just didn't get out of the way in time, and Lockheed and Boeing really do have these neat new weapons we got to test somewhere, and Hatch won't let us drop fallout anymore in St. George or any of those towns downwind from the test site. So how else we gonna keep the world safe for Democracy?)

In the remarkably well documented book, **Fallout: An American Nuclear Tragedy**, Phillip Fradkin tells with excellent linguistic expression, the detailed history of nuclear weapons testing conducted at the Nevada Test Site and nearby areas from the 1950's. He describes what happened to the families, who, without receipt of advance notice of nuclear tests, much less instruction on precautions to take for their own protection, or symptoms or treatment in the event of exposure, were inflicted with leukemia, Hodgkin's disease, lymphoma, cancers of the lung, stomach, brain, skin, uterus, ovaries, breast, pancreas, kidney, bladder, colon, prostate, and thyroid leaving devastated loved ones ill or dead from nuclear test fallout. These families were afforded no relief and were left no recourse but lawsuits. The Government used its vast resources to hire public relations firms to tell the mothers their children were in no danger, to hide evidence and health tests from the 1200 plaintiffs, and to mount vigorous defenses to insure no one ever received compensation for government-induced radioactive material exposure. They did this because they realized that if the public knew the truth it might threaten the nuclear industry's continued viability.

The families described in Fradkin's book are God-fearing, hardworking, ranch people who love their country, but were sacrificed without their consent, and lied to by their U.S. government in the name of protecting democracy. Today the situation is even worse, because it is no longer even the government officials (sworn to protect and uphold the people and our Constitution) who are in charge of these nuclear programs. Rather, in the name of "privatization", Lockheed (big

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in Newt's state of Georgia) won the contract to manage all of the "low-level" (deceitfully named to conceal the fact that it contains the same deadly long-lasting isotopes as so-called "high-level") waste, and Bechtel manages Nevada Test Site, and Raytheon manages (license to pollute the Colombia River) at Hanford, etc. In my attempts to discuss these matters with the D.O.E., all I find are smooth-talking young men with degrees in political science or public relations.

At the November radioactive waste conference in Utah, it was astounding to hear that the government is now contemplating "external regulation" of the D.O.E. contracts. Who, one might ask, will perform this regulatory function? The answer was the Nuclear Regulatory Commission. I then learned that the N.R.C. receives 100% of its funding from the licensees, i.e., the regulated community. So the N.R.C., which owes its very existence and survival to the corporations which generate this most lethal, long-lasting waste known to man, will provide "external regulation" to the Dept. of Energy, which dispenses billions and billions of tax dollars to those same generators to manage the poison they themselves have created. Where is the incentive to stop poisoning our rivers, our crops, our wildlife, our bodies, our children, and our future offspring?

What a happy little circle and boon to the economy all this must be! The nuclear machine can create weapons of mass destruction, pollute any where and anyone they like, in the name of "freedom and democracy" and be paid billions of tax dollars to manage the waste they create, that the government knows will cause cancer, mutations and death for hundreds of thousands of years in the future.

Mr. Giblen, the D.O.E. representative appearing at the Needles City Council on January 12th and the Board of Supervisors on January 26<sup>th</sup>, made a splendid attempt to sound rational as he explained why the Dept. can not tell the transporters where they may or may not take nuclear waste. Such direction would interfere with transporters' Constitutional rights to freedom under the commerce clause, and would, God-forbid, possibly expose the government to liability for the injuries, debilitating illness, and death that shipping the government's waste all over the country is sure to cause. It would smack of "rulemaking", implying we can't have that, now can we? Better we leave it to the trucking companies to decide where and when they haul this stuff. We'll make them **promise** to try to use the safest alternatives. And, for the same reasons, liability, we cannot know (or warn you) when radioactive shipments are coming through your town. We just have to wash our hands of this waste for the good of the country and national security, you know? (Mr. Giblen failed to advise us that the Research and Special Programs Administration, RSPA, recently issued a final rule eliminating the regulations requiring transporters of radioactive materials to develop and maintain

a written radioactive protection program. It was too "difficult and complex" to maintain). More please do not tell us what we do not want to know.

The scheme is just so perfect! With how many poisons can one absorb the lethal substance, (by inhalation, ingestion, or skin penetration) and not experience the deadly effects until 2 to 50 years later. When one is exposed to radiation, he or she may likely never know it until years later when the symptoms appear. One can't smell, see, hear, or taste ionizing radiation. And when one does get that lump, or suddenly collapses, or the hair starts falling out or the other symptoms appear, who will remember, if they ever knew, that the truck in the next lane to them on the I-15, that time they were going to Vegas, was full of compromised containers of radioactive waste from Fernald, or Oak Ridge, or other places in the east coast who want the stuff removed from their communities?

I expect what is fueling this insanity is the fact that if you store nuclear waste on site long enough, even if kept in concrete vaults with monitored retrievable storage, sooner or later the emissions get out—to the air, to the ground, to the water. Kept in one place, one might expect some cancer clusters to crop up in a few years. And someone might take a Geiger counter to the area and discover the presence of radioactive particles in much higher intensity than that in the background radiation, and oops! Proximate cause might actually be established, and the people who have been profiting off this industry of death might be found liable to the children of the young father who dies of prostate cancer at age 36, or to the mother who watched her children die of leukemia.

So it makes perfect sense, Department of Energy! Get the stuff moving, on the road! Increase the "background radiation" all over the country. We **stakeholders** can tell those yahoos from Needles and San Berdumb County that their cancers are just from the "sun". That ought to do it! Just don't tell the drivers where to go—then we'll be liable! We'll tell the transport companies: "It's your responsibility to choose the safest route. But, incidentally, we do suggest you go 200 miles out of your way through San Bernardino County. You see, we aren't telling you what to do or anything, but the community of Las Vegas is not really receptive to the idea of truck spills and train wrecks, with alpha, beta, and gamma particles and rays causing their gonads and breasts and thyroids to glow green. But Needles, Barstow, Death Valley—those cooperative, patriotic folks, they like it."

By the way guys, what are we going to tell the truckers themselves who have to drive those trucks? Are we going to make them wear protective gear? No, no, no! That will freak 'em out and make them think there's a danger. We'll have the Teamsters all over us! Just say the exposure rate is so minimal that there is

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absolutely no danger and its just those stupid job-killing, tree-hugging environmentalists who have given us manufacturers of weapons of mass destruction a bad name. Oh, yeah! Be sure and tell 'em that San Berdo is the methamphetamine capital of the world—might drive over there to that new **Fontana Hub** while you're at it, and pick up some speed and Monica stuff.

**(National/International Newsbreak:** President Clinton has announced his intention to give the military industrial complex \$100 Billion more dollars because, "You know, we been usin' so much of that stuff over there in the middle east and you never can be too careful with our fragile democracy. By the way, send some more green stuff out there to the Inland Empire—those district attorneys have been doing such a great job locking up all those crazy terrorist dissenters who keep going in there to the board and rattling off about nuclear waste. They been keeping the dangers from radiation real secret from their law enforcement and fire personnel too! They'll send their guys out no matter what kinda spill we got. Wish more counties were like that Tombstone, San Berdo! And those Fontana and Riverside Police Departments—boy, howdy, those are some good police forces, huh? Find out if you can get that one Fontana cop here for my State of the Union, what do ya say, Hillary? We can set him right next to Rosa Parks. Won't that beat all!"

SERIOUSLY, TO THE DEPARTMENT OF ENERGY AND TO ALL THOSE WHO READ THESE COMMENTS:

I hereby incorporated by reference some summaries prepared by others of comments made, on very short notice, by citizens who gave testimony (whatever you choose to call it) at the two meetings you gentlemen, Mr. Michael Giblen and Mr. Kevin Rohrer, attended.

While gratified by the comments of all the caring people who spoke, I was particularly moved by the comments of the former military test pilot, Mr. Bob Stapleton. A deeply patriotic man, he brought me to tears after the Needles meeting, when he described the cancers growing on his own admiral, as Bob witnessed him slowly dying, along with other men who served their country along side Bob. They were never told the risks of ionizing radiation. We need to begin to understand the sense of betrayal left with our citizens when, because of nuclear matters, we are lied to, facts important to our health, protection, and safety are concealed from us, and when our government does stupid stuff to protect the backsides of the big corporations. One of those stupid ideas is transporting nuclear waste all over the country and the world.

**THE ALTERNATIVE WHICH WAS NOT DISCUSSED IN THE E.A. IS "YOU MAKE IT; YOU KEEP IT". Store on site in monitored retrievable storage until decay. THOSE WHO PROFIT FROM MANUFACTURE AND SALE OF NUCLEAR WEAPONS, ENERGY, AND WASTE, MUST PAY, not the victims, and not the taxpayers.**

### **Environmental Justice:**

It is not only the poor disenfranchised remote community of Needles, and the Native tribes in the Mojave you are threatening with the scheme to haul nuclear waste through their downtown, although the idea does certainly run counter to any concepts of environmental justice. Needles' population is about 33% children, (don't need to worry about their vote, do we?), 27% senior citizen, it has a huge proportion of Hispanic, minority ethnic groups and Native Americans.

And Don't Forget the River!

D.O.E. ignores the fact that whether the trucks and trains cross the Colorado River at Hoover Dam (WHO thought of this, pray tell?) or Topak Bridge, down by Needles, the crossing is still upstream from Parker Dam. That's where Southern California's Metropolitan Water District's aqueduct sucks up water to quench the thirst of millions of residents of southern California. These transportation plans affect all of Southern California, not just the residents of "sparsely-populated regions" D.O.E. routinely feels justified in decimating.

The Department of Energy says they will discuss these matters with their stakeholders, and try to "reduce risk". Many of us believe that the state of nuclear waste disposal planning in our country and the world is in such disarray that a Blue Ribbon Commission as proposed in Senate Bill 540 is called for.

At the Utah conference, many compact commission members from across the country held similar views, it seems, as all reported failure to site satisfactory disposal facilities.

**It is necessary to reclassify, redefine the wastes so they may be managed responsibly, rather than all wastes being thrown into one or the other deceitfully- named category. And we need to take a new look at the LLRW law passed in 1980, amended in 1985, unworkable from the outset as demonstrated by the U.S. Supreme Court. We must assure that shallow trench burial is not an option for**

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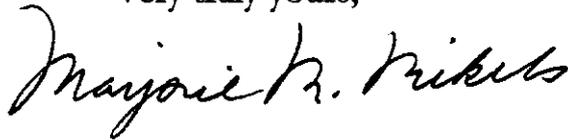
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“disposal” of the waste. It does not keep the waste from the environment—it is the environment!

These issues must be dealt with openly and **GLOBALLY!**

This Environmental Assessment is not a good example of how to gain the confidence of the people, so needed if a problem of the magnitude we face with the build up of radioactive waste, will be met with any kind of reasonable solution. The 21<sup>st</sup> Century is upon us. We can do better.

Very truly yours,



MARJORIE MUSSER MIKELS

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**MAINLINING NUCLEAR WASTE INTO THE VEINS OF  
AMERICA**

(Should we haul ionizing radioactive waste from all over the world and the country and dump it in the ground at Yucca Mountain?)

To: Ms. Wendy R. Dixon, EIS Project Manager  
M/S 010  
U.S. Dept. of Energy  
Office of Civilian Radioactive Waste Management  
Yucca Mountain Site Characterization Office  
P.O. Box 30307  
North Las Vegas, NV 89036-0307

By e-mail (<http://www.ymp.gov>) and fax (1-800-967-0739) and U.S. Mail

Date: February 9, 2000

From: MARJORIE MUSSER MIKELS  
201 N. First Avenue  
Upland, CA 91786

Even though the Department of Energy has "suggested" (not "directed", as that might create liability on DOE's part) to eastern waste haulers that they bypass the Las Vegas Valley when shipping waste to the Nevada storage site, and instead go through **San Bernardino County** over to Barstow on Highway 40, then back up towards Nevada on I-15 to Baker, and north to the site, and even though ionizing radioactive waste will be traversing the entire breadth of San Bernardino County from the soon-to-be dismantled San Onofre nuclear power plant, the Diablo Canyon plant, and from Asia, (brought into the country through the Ports of Long Beach and Los Angeles, up the Alameda Corridor, and out the I-10 freeway to I-15), and even though the citizens of San Bernardino County will be exposed to high and "low" level radioactive waste flowing through their communities night and day by rail and truck (and possibly plane), still, the U.S. Department of Energy has not seen fit to hold any public hearings in San Bernardino County by this February 9, 2000, final cut-off date for submission of public comment.

I heard yesterday that, at the urging of Senator Barbara Boxer, (*Thank you, Senator Boxer*) a public hearing will be held on 2/22/00 at San Bernardino. I hope that written comments of our overlooked county's citizens will be

accepted for consideration by DOE, up to and including that date. I have made that inquiry to the department and heard nothing to the contrary. Therefore, I am assuming February 22<sup>nd</sup> will be the new final date for submission.

I will submit amplified comments by that date. I would like here to simply recount a dream I had on or about Martin Luther King's birthday.

I dreamed the United States was a huge female body, and its roads and rails were her veins, carrying the lifeblood of the mother-country. I dreamed that evil greedy men were injecting those veins from a syringe and needle full of radioactive waste, for their own private profit. The waste was making her, our precious mother-country sick, and the smell of death surrounded her. But she was addicted to the nuclear madness shot into her blood—she thought she had to have nuclear power, nuclear bombs, enriched uranium, radiated food, radiation in hospitals, because the rich powerful corporations, the pimps, controlled her, and kept her doped up so she no longer had liberty to make wise choices.

Then I woke up. And sure enough—the rich powerful corporations want to fill our highways and rails with shipments of nuclear waste from all over the county and the world so they can bury it at Yucca Mountain, and remove it far away from the places where **they made it**. They have earned their millions, and billions. “Now take the waste away from here!” People will know it was us who contaminated their soil, their air, their water, their genes, their offspring, caused their cancer, killed their mother, their aunt, their sister, their child. We could be held liable!

If we spread it everywhere, *we can increase the background radiation everywhere!* No one will ever be able to prove it was us who did it. They won't know. It might have been the stainless steel in her braces or baby carriage from the recycled power plant. It might have been the leaks in the casks in the truck in the lane next to the family car on its way to Vegas. It might have been the daily trains coming through on the tracks across the fence, carrying loads of waste emitting **silent death**, poisons one cannot see, smell, feel, hear, or taste. Maybe it will be next year that the lump is found. Perhaps it will not happen for five or ten years. But the cancer will come. And when it does **you will never be able to show “proximate cause”**. Not against Lockheed Martin. Not against Bechtel, or Westinghouse, or the University of California, or G.E., or Los Alamos, or the United States Government, who in

the name of protecting the peace, in the name of defending democracy, in the name of Progress, is killing us.

So, I see in the EIS, at page 2-69, paragraph 2.3.1, several disposal concepts were considered:

We could rocket it to the sun! We could dump it in the ocean! Let's put it in the polar ice sheets—that won't do anything about global warming will it? But in the end, the National Academy of Science and Congress said the *sensible* thing—"Energy Department, you just look at one alternative—Yucca Mountain."

Sure, that's a great idea! Yucca Mountain is on Shoshone Land. Just a bunch of Indians—we can buy 'em off or kill 'em off. Look how sick the Navajos are now, since we gave them all those great jobs mining uranium on their reservation. And you know those Indians down in Death Valley—the Timbisha Shoshones? They have been mad at us forever since we kicked them off their land—let's give them back some rights at Furnace Creek where the water is most likely to be contaminated with radiation. (The aquifer under Yucca Mountain site is at or near Furnace Creek Ranch. "The heat from the decay of radionuclides in the waste would cause temperatures in the rock near the disposal containers to rise above the boiling point of water" for a few hundred years to a few thousand years. P. S-41 to 42). Boy, Furnace Creek is going to be the right name for that place alright! We can direct the trucks to come north from Baker on Hwy. 127 right through Death Valley, so they don't need to go through Las Vegas. The Indians will love those jobs—they can sell turquoise to the nuclear waste truckers.

Well, what about the fact that Yucca Mountain is right on two intersecting earthquake faults—the "Ghostdance" fault and the "Sundance" fault? Aw, shucks, their ain't been an earthquake in those parts since 1992, and it was only 5.6 on the Richter scale and it was centered at Little Skull Mountain—that's 12 whole miles away—it "caused no detectable in tunnels at either the Yucca Mountain site or the Nevada Test Site." (P. S-37)

By now, everyone knows that under the site at Ward Valley, where the government wanted to dump "low level" radioactive waste, is the largest groundwater aquifer in the state, containing an estimated thirty million acre feet of water. But how did that water get there? The Native Americans, who have been there for thousands of years, say the Amargosa River, which the E.I.S. sloughs off as if it is meaningless because it is mostly a dry river bed, used to be

above ground. It went underground during a massive earthquake, which made a big crevasse, and caused the river to sink, and water to be trapped in the rock formations beneath the ground. And the report is correct—the groundwater flow system is very complex, and there is **scientific uncertainty** about the groundwater flow boundaries. To put it correctly, they don't have a clue where that water runs underground, and how the emissions from the buried nuclear waste are going to migrate underground.

Forked-tongued talk, like “the depth to groundwater and the arid environment would combine to reduce the potential for meaningful contaminant migration” (at P. S-41) is *meaningless* and deceitful. What is a *meaningful contaminant migration*?

Throughout the entire report, there is this attempt to minimize all of the impacts, as if it is being prepared by proponents hired to justify this proposal. There is only one animal living at the site that is a “threatened” species—and that's just the same old desert tortoise. But Yucca Mountain is at the north end of the tortoise's habitat, and lots more of those critters live other places—so what's the big deal? We'll minimize the impact. Other than that, all we have are bats, a lizard, an owl and a beetle. Okay, so there will be “small quantities of routine releases of radioactive materials from the repository”. (What is a “routine” release?) But it's only Krypton and “naturally occurring radon” and the doses are just so small. Besides, we're disturbing such a small area of land.

I believe from the above you will conclude that I oppose the project, and prefer No-Action Scenario #1, of the options you mentioned. Some people have stated it, “You make it, you keep it.” And that includes the liability. I do not want it on the freeway going through my town. I suggest that each site be entombed with concrete, as giant monuments to the arrogant folly of man. I suggest we stop generating nuclear waste until we have more reasonable alternatives than shooting it into the sun, throwing it into the ocean, or burying it in the land.

More later.

Thank you.

Sincerely,

MARJORIE MUSSER MIKELS