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SEP 20 2001

13 September 2001

Ms. Carol Hanlon
US Department of Energy
Yucca Mountain Site Characterization Office
[M/S #025]
PO Box 30307
North Las Vegas, Nevada 89036-0307

Dear Ms. Hanlon,

This missive will convey my comments on the "Possible Site Recommendation for Yucca Mountain."

Responsibility is the primary theme of this letter. If a responsible tack is taken regarding the future of nuclear waste in the US then an all inclusive policy governing its production will be necessary.

Nuclear power was the "good thing" to come out the atomic age. It was the other face of a technology originally designed for use as an ultimate weapon. Plutonium and other derivative waste products were the serious toxic agents that were leftover from the process of harnessing this new potential energy source. The national priority was to continue with nuclear research and technology. It was deemed acceptable to leave the answers for coping with the waste for a later time. There was even a hope that nuclear waste products could be used as a source of energy. Of course, this technology proved illusive. By the 1980s the build up of nuclear waste was reaching alarming levels and eventually The Nuclear Waste Policy Act was established to give the Federal Government responsibility for the final disposition of the nuclear byproducts.

There are a number of reasons why I conclude that focusing on the Yucca Mountain site as a repository for the nation's spent nuclear fuel and high level radioactive waste has not been the most responsible course of action.

I believe that the reasons for establishing the site exclusively in Nevada were politically motivated. Nevada has very limited influence in determining national policy. By isolating that state and pursuing no other site for selection it becomes apparent that the people of Nevada will not ultimately be able to prevent Yucca Mountain from being used as a nuclear waste repository. The state of Nevada might have been exempted if the many years Mercury remained an underground nuclear testing site had been taken into consideration. Moreover, Nevada has no

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nuclear power plant. In fairness to the majority of Nevada residents who have voiced their opposition to a repository for nuclear waste, it is simply not their responsibility.

The Site Characterization Progress Report (issued in January of 2001) makes repeated references to an eventual "permanent closure" of the repository site. This implicitly means that it will be able to accept only a finite amount of waste. If that is the case then either the production of nuclear waste will have to end or another repository will have to be opened. No mention of another repository site has been made at the present time. A responsible policy would consider this possibility now as unpopular as that prospect may be. The Progress Report also makes reference, on page 2-6, to: "... the inherent uncertainty in estimating the postclosure performance for thousands of years." I contend that the risk of miscalculation in determining the strength of housing for materials with such great half-lives is enough to recalculate even limited future dependence on nuclear energy. It would be easy to reply that the scope of site recommendation plans are focused upon the question of Yucca Mountain's acceptability as a repository site and not on national nuclear policy. Nonetheless, I believe the two facets are inextricably connected.

I contend that at the present time a repository site for nuclear waste could not find a home in an eastern state. This has less to do with geological fault lines than it does with politics. It is interesting that grant development permits for communities are not accepted if there is no accommodation for garbage collection and septic systems but that this is not the case for nuclear waste. It is also interesting that the Department of Energy has spent, by its own estimates, over \$6.7 billion alone "in studying various means to fulfill the Federal responsibility." When the kilowatt price of nuclear energy is assessed the cost of waste disposal must be added because the expense is borne not by the utility companies but by taxpayers.

There is also the issue of safety. In the literature I have received I did not find a list of contingency plans designed to contain problems that may arise after implementation of the site. There is also no literature on whether the site would be capable of withstanding a terrorist attack, conventional or otherwise. It would be perspicacious to include in this literature comparable safety strategies for transporting the nuclear waste.

There is certainly a need for developing a containment strategy for nuclear waste. It is wise to plan for the future but Yucca Mountain's exclusivity as a repository site shrouds the interrelated issues.

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If I have to put forth an answer to meet the 20 September 2001 deadline, I would tell the Secretary of Energy not to submit the Yucca Mountain Site for development unless the following questions are satisfactorily considered:

1. Will Yucca Mountain have the capacity to house all the spent nuclear fuel and high level nuclear waste currently in the US?
2. Given the current level of nuclear based power consumption, how far into the future will Yucca Mountain be able to accept this kind of waste?
3. Can the waste be retrieved if something goes wrong with the repository?

4. Are there assurances for protection of Yucca Mountain and for the transport routes?
5. What will be the approximate kilowatt per hour cost for nuclear energy once the repository site costs are factored in?

Thank you for considering my comments. It was my hope to have submitted and delivered this paper prior to 20 September 2001 but it may arrive late secondary to flight delays that have resulted from the 11 September 2001 terrorist attack.

Sincerely,



Brian Carter