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October 11, 2001

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Mr. Lake H. Barrett, Acting Director
Office of Civilian Radioactive Waste Mgmt.
Department of Energy
1000 Independence Avenue
Washington, DC 20585

Dear Mr. Barrett:

Subject: Comments on the Possible Site Recommendation for Yucca Mountain

As you request in your letter dated August 27, 2001, I am pleased to submit these comments on the possible site recommendation for Yucca Mountain. I strongly support a decision by the Secretary of Energy to recommend Yucca Mountain for development as a repository for commercial used nuclear fuel and radioactive waste from DOE and national defense programs. I believe that a sufficiently strong technical case has been made by DOE for the suitability of the proposed Yucca Mountain site, such that DOE should proceed to the next stage of repository development-preparation and submittal of a license application for repository construction.

DOE has collected an impressive amount of information about the Yucca Mountain site since its initial investigation nearly 20 years ago. This information was obtained from extensive surface, subsurface, and laboratory investigations. Furthermore, DOE has conducted extensive analyses based on this information to assess the suitability of the Yucca Mountain site. It is my belief that the information collected and analyses conducted by DOE to date provide an adequate basis for finding the Yucca Mountain site is suitable for further development as a repository. I am aware of no technical issue that should prevent the President from concluding the Yucca Mountain site is suitable.

In your letter, you requested views on specific topics related to the suitability of the Yucca Mountain site for continued development. My responses are listed below.

> *Please provide your views concerning whether the Yucca Mountain Preliminary Site Suitability Evaluation (PSSE) and other scientific documents produced by the Department provide an adequate basis for finding that the Yucca Mountain site is suitable for development of a repository. If you believe that certain aspects of the PSSE are inadequate, please detail the basis for this belief and indicate how the documentation might be made adequate with respect to these aspects.*

Yes, the Yucca Mountain site is suitable for development as a repository.

> *If the Secretary determines that the scientific analysis indicates that the Yucca Mountain site is likely to meet the applicable radiation protection standards established by the*

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Environmental Protection Agency and Nuclear Regulatory Commission, do you believe that the Secretary should proceed to recommend the site to the President at this time?

Yes, the Secretary should proceed to recommend the site to the President at this time. The DOE has conducted a multitude of site studies, laboratory experiments, and analyses that have reached sufficient maturity for the President to develop an informed opinion.

Are there any reasons that you believe should prevent the President from concluding that the Yucca Mountain site is qualified for the preparation and submission of a construction license application to the Nuclear Regulatory Commission?

No. The scientific evidence shows that the site is qualified for the next phase of repository development--preparation and submission of a construction license application to the Nuclear Regulatory Commission.

Please provide any other comments concerning any relevant aspect of the Yucca Mountain site for use as a repository, or that are otherwise relevant to the consideration of a possible recommendation by the Secretary.

Additional comments provided by EPRI (formerly known as the Electric Power Research Institute) as a whole can be found in the attachment to the letter sent to you by Kurt E. Yeager dated October 2, 2001.

Sincerely,

Theodore U. Marston, Ph.D.
Vice President & Chief Nuclear Officer

Enclosure

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