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12 MS. TREICHEL: My name is Judy Treichel, I'm
13 the Executive Director of the Nevada Nuclear Waste Task
14 Force, and we are a public advocacy group that has been
15 working for 15 years to make possible public
16 participation in this program. We have forced a lot of
17 things to happen that wouldn't have happened otherwise.
18 But I'm not totally sure how important in the final
19 analysis that has been. Because we don't see the
20 public comment is making much of an effect.
21 This is a project that has to be done
22 absolutely right, and it has to be done right the first
23 time. There can't be any mistakes. There can't be
24 mistakes or accidents with transportation. There can't
25 be mistakes in estimation of whether or not there will

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1 be leaks or whether or not there will be contamination.
2 If that happens, it's too late. And you're sitting
3 here in Amargosa Valley, where the first line of
4 resistance, and it isn't really resistance, it's where
5 the human receptors, as we see in many, many reports,
6 the human receptors are referred to. These are the
7 human receptors.

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8 And I know that DOE understands the idea that
9 it has to be done right, because I saw posters out and
10 around the Yucca Mountain Project site that say, "Doing
11 it right the first time." And we always sort of
12 chuckled when we saw those, and our first response was,
13 "When do you start?" But there have been so many
14 things that have not been done right, and I think just
15 these meetings are classic examples where times change,
16 addresses change, people weren't notified.
17 One of the classic examples happened last
18 night when in the Federal Register notices, there have
19 been two that have come out with wrong addresses.
20 Either small or large errors in the addresses. You now
21 have public comment forms that you hand out with
22 absolutely different addresses on those. Last night I
23 saw a notice that someone received in the mail saying
24 effective immediately, the post office box and Zip Code
25 for the U.S. Department of Energy has changed. Use the

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1 following address for all future mailings. This is in
2 the middle of a public comment period.
3 I would suppose that the mail will get
4 forwarded. I'm not sure about that. Because when I

5 submitted written comments on the guideline change,
6 mine were returned to me. Because the address had been
7 changed from what was -- from what I had gotten and
8 where I was supposed to have sent it. So then, you
9 know, I finally got the right address, but what I'd
10 been given had the wrong address.
11 This may seem very piddley, but it's the sort
12 of thing that you don't do if you're not careless. If
13 you really cared, if it's really important, if doing
14 things right is a big deal, then you get things like
15 addresses right. You give people proper notice. And
16 it may not be careless. If it's not careless, it's
17 worse. It means that you want confusion. It means
18 that you want to hold a meeting where one person shows
19 up.
20 This is just absolutely wrong. In doing it
21 right, how can you be sure you're doing it right when
22 you have orders of magnitude of uncertainty? And all
23 of those reports that were referred to back there show
24 the number of orders of magnitude of uncertainty. So
25 right falls somewhere in this huge range. If things
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1 were being done right, and were being checked right,

2 and were coming out right, we wouldn't have had a
3 change in the EPA standard. Which is quite similar to
4 the one that it was changed from. Not quite as good,
5 but similar, and it's being sued. The state is suing,
6 and I'm part of a grass roots organizations lawsuit
7 opposing that.
8 The guidelines wouldn't have had to have been
9 changed. The site doesn't meet the current guidelines.
10 They're being changed. And the licensing rules
11 wouldn't have to be changed. I've been to all of the
12 meetings. I've heard all of the comments. So many
13 people opposed for so many good reasons, and from what
14 we see, they've not been listened to.
15 Very recently there was an article in the
16 paper from the project on government oversight, in
17 which they have compiled a lot of the test results, and
18 DOE was sort of tested, and security was breached in a
19 majority of cases when someone tried to do that. Every
20 test failed. When it came to transportation, and the
21 sorts of security that are needed for that. These
22 people, not the government project office, but the, but
23 the actual government police and security people were
24 able to breach their own security.

25 So those things have to be cleaned up before

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1 you even have a project, before you can have any sort
2 of trust or confidence.
3 I don't think you'll ever have it with
4 Nevadans, but the first honest thing the Department of
5 Energy could do is walk away from Yucca Mountain. It
6 would be the first way that people could see that if
7 you had a lousy site, if you weren't ready to do
8 something, if it couldn't be guaranteed right the first
9 time, that you actually had the integrity to walk away
10 from it. And finally, Abe was talking about all of the
11 work that had been done and now we have to determine if
12 this is acceptable.
13 This is not acceptable to the people of
14 Nevada. And there's a professor at UNLV who works in
15 ethics and policy studies, and he talks about how risk
16 analysis is done, and then decisions are made. But in
17 this case, he refers to risk analysis having been done,
18 and then risk is assigned to someone else. You are
19 assigning that risk to the people in this area, to the
20 people from Death Valley, to the people from Amargosa,
21 to all of the people who live downgradient from Yucca

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22 Mountain. And that's not fair. And you can't do that.

23 If this is a proper project, you would have to have

24 informed consent. That would mean that you had taken

25 public comment and you had taken it seriously, and you

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1 had the right to recommend the site. I do not believe

2 that you have the right to recommend Yucca Mountain.

3 Thank you.