

MS. FELDMAN: My name is Jane Feldman,

4 J-A-N-E, F-E-L-D-M-A-N.

5 I'm submitting comments for the Toiyabe

6 chapter of the Sierra Club. My comments are signed by

7 our chair, Ellen Pillard, E-L-L-E-N, P-I-L-L-A-R-D.

8 T-O-I-Y-A-B-E. Toiyabe -- I just have a page and a

9 half and I'll read this and then turn this in.

10 It's addressed to Ms. Wendy Dixon of the

11 Department of Energy, the Office of Civilian

12 Radioactive Waste Management.

13 We say: Dear Ms. Dixon, Nevadans are

14 concerned about the continuing effort to place

15 high-level nuclear waste at Yucca Mountain. Storing

16 dangerous nuclear waste in the Nevada desert where it

17 will remain for 10,000 years is unacceptable to most

18 Nevadans, but we weren't asked when the Federal

19 government decided to study the Yucca Mountain site.

20 We have been repeatedly assured that science would

21 decide this question.

22 Now, before the final Environmental Impact

23 Statement has been released, the Department of Energy

24 is holding public hearings on Yucca Mountain as the

25 sole nuclear repository in the country.

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1 Since 1986, the Sierra Club has opposed the

2 storage of nuclear waste at Yucca Mountain. The list

3 of our concerns is long.

4 First, the entire approach to the project is

5 flawed. There is no good science when only one site,

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6 Yucca Mountain, is being studied. An Environmental
7 Impact Statement requires that alternatives be
8 reviewed. In this case, no other locations have been
9 considered, and even the two scenarios of the No Action
10 Alternative in the DEIS are unreasonable and
11 infeasible.

12 A second concern is transportation. The
13 DOE's proposal for transporting nuclear waste takes
14 nuclear waste through 43 states and could jeopardize 50
15 to 60 million people. With the recent serious toxic
16 spill in a Baltimore tunnel, a railroad toxic spill in
17 the Midwest, and several toxic spills in eastern
18 cities, this is a major issue. One nuclear accident in
19 the transportation of this waste could jeopardize the
20 health and safety of all nearby communities.

21 One of the most serious issues that has been
22 raised by the scientific work at Yucca Mountain is
23 ground water contamination. The hydraulic
24 relationships between the lower carbonate aquifer and
25 the volcanic units and the alluvian units beneath and

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1 down gradient of the aquifer are poorly understood.
2 Will there be contamination in the Amargosa River?
3 Will that contamination spread to other aquifers?
4 Without clear answers to these questions, locating the
5 nation's high-level nuclear waste in irretrievable
6 underground tunnels in the Nevada desert is
7 unacceptable.

8 We are concerned with health modeling,

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9 population modeling, and the dose calculations, and the
10 cumulative long-term and perceived risk calculations.
11 We are concerned that engineering barriers are
12 necessary, when we were supposed to be able to rely on
13 geologic barriers alone for protection. There has been
14 no field testing of the system for rod retrieval. We
15 are concerned about the additive risks of placing a new
16 Superfund site at a place that is already a Superfund
17 site.

18 The government would like to cast this as a
19 Nevada problem, but it is truly a national issue. The
20 Sierra Club with its 750,000 members nationwide
21 recognizes this and is working to stop the unsafe
22 transportation and storage of nuclear waste in Nevada.

23 We would like to thank Senator Harry Reid for
24 his longtime hard work to stop Yucca Mountain. Senator
25 John Ensign and Nevada Governor Kenny Guinn also

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1 deserve thanks for joining in this critical battle to
2 protect our communities and our environment.

3 Sincerely, Ellen Pillard, Chair, Toiyabe
4 Chapter, Sierra Club.