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Comments for
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~~Executive Summary~~
~~DOE Yucca Mountain Repository Program~~
~~Impact Report for White Pine County, Nevada~~

hearing session
Ely, Nevada

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Executive Summary

The Nuclear Waste Policy Act of 1982 created a program designed for the management and disposal of high-level nuclear waste and spent nuclear fuel. In 1987, Congress amended the act leaving Yucca Mountain as the sole area to study for the development of a nuclear waste repository. If recommended by the Secretary of Energy, nominated by the President to the Congress and authorized for construction and operation by the Congress, the Yucca Mountain repository system will have been unilaterally imposed on the residents of Nevada along with its attendant concentration of risk. While arguably necessary, the program has long since lost any concept of fairness or equity with respect to the residents of Nevada. All other states and the U.S. government, who have benefited from the creation of this waste, will have all associated risk irrevocably transferred to the State of Nevada and its residents. In this regard, the Yucca Mountain Repository program represents a unique and unprecedented unilateral transfer of risk.

Within Nevada, the necessity to protect the State's gaming-based tourist economy will result in shipments of spent nuclear fuel and other high-level radioactive waste moving through rural locations such as White Pine County. Very simply, the largest concentration of long-lived extraordinarily dangerous high level nuclear waste in recorded history will be transported through rural Nevada and stored in perpetuity at Yucca Mountain, presuming the site is found suitable.

The Yucca Mountain repository system represents an unwanted industrial activity. The allocation of Nevada's natural, social, fiscal and economic resources required to support the location and operation of the repository system represents an opportunity cost as these

same resources will be unavailable for allocation in support of other desired industrial activities.

Since 1992, when White Pine County received status of Affected Unit of Local Government, the County's Nuclear Waste Project Office and the White Pine County Board of Commissioners, have commissioned a series of independent studies from respected researchers at technical consulting firms as well as academic institutions. The independent studies were designed to inform the residents of White Pine County on the range of impacts that might be expected if the State of Nevada designates a legal-weight truck route through White Pine County.

The findings indicate that the impacts for White Pine County are highest in the areas of emergency management, highway accident risk, radiation exposure risk, and from stigma that may reduce the desirability of White Pine County as a place to live and as a destination for tourists.

Within the Draft Environmental Impact Statement (DEIS) for the Yucca Mountain Repository, the DOE has provided only cursory analysis of the risks inherent in transportation of quantities of highly radioactive spent nuclear reactor fuel and high level waste on an unprecedented nationwide scale over a very long period of time. The limited transportation analysis performed for the DEIS was often based on grossly outdated or simplified demographic and physical data, even though up to date information of this type was readily available. A rationale for this approach is very difficult to understand, but has the effect of trivializing or grossly underestimating the real risks associated with transportation of high level waste.

Transportation incident/accident related impacts resulting from the presence of the Yucca Mountain Repository are both wide-reaching and potentially devastating to the residents of White Pine County, its economy and society. They are well beyond anything identified by the DOE in its Yucca Mountain DEIS.

Regrettably, we will not have sufficient opportunity under the DOE's current schedule to review the final EIS, prior to issuance of ~~the report~~ ^{the potential site recommendation} to determine if their final assessment of impacts approaches those we have identified. Further, we will not know with certainty until a much later time frame as to whether spent nuclear fuel and high level waste destined for the Yucca Mountain Repository will in actuality be transported through White Pine County ~~on legal weight tracks.~~

Further, the DOE has, to date, completely ignored socioeconomic and stigma based effects of the repository program on the economy and society of the residents of White Pine County. Many people living in White Pine County have direct personal experience with the societal effects of radiological exposure as "downwinders" from Nevada Test Site atmospheric testing of nuclear weapons. To represent through silence that there are no socioeconomic or societal effects from a program that has the potential to subject citizens and the environment to exposure from radioactive waste is difficult for White Pine County residents to accept.

The result is that the DOE has so far represented to the Congress, the Administration, the State of Nevada, and affected units of local government that the overall risk implicit in the transportation to and storage in perpetuity of high level nuclear waste at Yucca Mountain represents minimal and statistically acceptable risk and is completely manageable. We believe this conclusion is disingenuous and based on flawed, incomplete analysis and/or simply failure to consider certain impacts of the program. Consequently, we strongly disagree with the DOE's findings thus far.

Rather, we feel that there is significant risk of unanticipated consequences inherent in the Yucca Mountain Repository Program. When viewed in totality, the risks in an overall sense appear unmitigable through any reasonable means. It will be very difficult for the nation to transfer its nuclear waste risk to Nevada without diminishing the health, safety, and welfare of the states' residents and visitors. It is our view that these impacts can only be fully mitigated by not going forward with the Yucca Mountain Repository Program. That is our fundamental conclusion.