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Department of Energy  
Office of Civilian Radioactive Waste Management  
Yucca Mountain Site Characterization Office  
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Gentlemen:

I have been a reviewer of the various incarnations of the *Environmental Impact Statements* for some time now and I will continue this critical review by responding to the most recent topical inputs, dated August 28, 2001. Having attempted to transmit this via Fax, only to have my system inform me that your modem is not compatible (it's the only one I've ever encountered), I am sending it in this manner.

Concerning the Yucca Mountain Preliminary Site Suitability Evaluation (PSSE), I find that the various arguments presented in the studies are structured in such a manner so as to justify the DoE's monumental expenditure of these taxpayer-funded activities without any prior authorization from those paying the bills. The designation of Yucca Mountain as the **only** depository, an outstanding example of the "representatives" from 49 of these United States looking for a small (only three electoral votes) and poorly represented state where they could dump their toxic waste. For all this "study" time, it has continually attempted to sell the public on the "temporary" nature of the Yucca Mountain site. I grew up in Washington, DC, and know that the so-called *temporary* buildings, like the old Munitions Building (on Constitution Ave. near 19th St.) was built for WW1; it was in use for more than four decades. Temporary? Very little that the government enacts is temporary (has a *sunset* date). It's as if Cheops built a pyramid as a temporary repository for his collection of cartouches.

Even if the Secretary determines that the scientific analysis indicates that Yucca Mountain is suitable, it **should not** be designated as the permanent repository. The depository is predicated on the usability of thousands of "carefully designed and prepared" containers of low-level and high-level radioactive material, suitable for storage for 10,000 years. First of all, the government hasn't been capable of securing hazardous material for 40 years, much less for 10,000 years. Witness the hazardous material storage at sites such as Dugway, UT, which has been leaking for years. Also, if these new containers are so hazard-free and safe, why then is it not the most practicable to bury those containers at the sites where they are produced, rather than go thru the exercises of transporting that same material across public roadways?

I believe that the Yucca Mountain site **has not been** sufficiently analyzed to positively ensure that it is a seismically secure location for hazardous material. In fact, there are few proposable sites west of the Rockies which would be seismically safe. Maybe a more suitable site would be the extremely large area in Central and West-Central Australia, what with it's lack of populated areas and abundance of nothing (i.e. the *very* outback)?

No rational organization would expend huge sums of company funds in building or "studying" an R&D project without first engaging in due diligence and detailed planning, looking at all of the viable alternatives and then opening the final guidelines/requirements to open bidding as a finalized proposal. This Yucca Mountain project is a "temporary" project in as final a form as it will ever become. It has become a monumental *make work* program, with initial guidelines similar to most other government programs, i.e. starting with an initial idea and then growing like Topsy, even as the program is underway, never really knowing just what they want as a final end-item.

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Thank you for the opportunity to review these documents.

A handwritten signature in cursive script, appearing to read "L. H. Garner".

Lou Garner