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12 enclosuresREPORT ON TRANSPORTATION TO YUCCA MOUNTAIN

Dr. John Cantlon, the chairman of the NTERB, in August of 1993, at ORNLV, announced that the only rail plan for bringing the HLMW to Yucca Mountain was from California over to Gene through Sandy Valley and Pahrump to Amargosa via the Von Schmidt line and up to NTS.

That's when I went back to college to find out about Y.M. After taking geography, geology, human biology here in Pahrump at the CCSR, I was tutored in radio biology, microbiology and other subjects to help me understand the science being investigated. Because of my interest in transportation I interviewed truck drivers (Class 1 clearance) and rail road engineers who drive the trains carrying HLMW waste.

Therefore I contend that the transportation of 20,000 cannisters and 20,000 metric tons of DOD waste (Now DOE) in 55 gallon drums and no one knows what they contain including my bugs, is totally unacceptable.

This report explores the transport problems in my home state of Nevada. We are one of the largest states in the union. U.S. Interstate 80 in the north and 15 in the south, run east and west. Trains do run parallel to these highways. On the other hand U.S. 95 our only north south interstate is a 9 hazard (none higher) and state route 160 through Pahrump (1st responder if there was an accident) is a 7 hazard. Stateline road (Bell Vista) to Death Valley Junction, Calif. is not even on your maps. If HLMW and better than Class C waste is shipped from the NTS there is no protection for the public, the truck drivers, and escorts. Terrorists, extreme weather (variances in temperatures of 50° daily) or often occurring flash floods. The road is two lanes, no shoulders or runouts and 100 miles approximately between drinks or bathrooms or any services. U.S. 95 is for hundreds of miles just as I have described. In Nevada the only available rest areas intra state are at brothels or casinos.

The Y.M. project consists of not one but two repositories. The 140,00 metric tons of Nuclear Power Plant reactor fuels will be placed in unsafe cannisters. The DOD (now DOE) waste 20,000 metric tons will be in 55 gallon drums and stored in the questionable hot or cold repository and will breakdown into all kinds of dangerous chemicals over the short time and maybe before the cannisters break and fall apart. (Much breakage will be due to transport over various terrains, barometric pressures, faulty workmanship building cannisters and worse.

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The Cannisters containing the rods weigh 125,000 pounds. They are about 20 feet long and 10 to 12 feet wide. Legal weight limits in Nevada are 80,000 pounds. The trucks will need extra axels, the weight of the loaded trucks will tear up any highway and they cannot travel over 20 to 30 miles per hour. Can you imagine the dangers of going up or down US 95 on this two lane highway? (and for hundreds of miles) View accident reports and see how many hours ~~our~~ one north south road has been closed. 90° turns required through Tonapah and Beatty will totally disrupt traffic. How long and what dose of radionuclides will be lethal to the public along any of the routes? Hormesis effects are not known.

From the Transportation Series of the National Conference of State Legislators in January 2000 the enclosed page shows the charges for transport of HLW from 24 states. Nevada charges \$500 per annual fee and \$150 per trip, plus actual cost for investigation. The investigation process in Nevada consists of: the perpetrator reports the accident to the Highway Patrol, Nevada's only agency open 24 hours. It then goes to the DMV's investigation department where it is analysed and fines are then imposed. Price Anderson is now up to \$9.7 billion. How would that be doled out to survivors and how much would be paid to attorneys? What if whole towns and cities were destroyed?

The executive order says it all. The transport for 70 years or more to fill both repositories is deadly to our state and nation but illconceived. Nevada has no public health department that might protect us from epidemics, pandemics, bioterrorism or worse. The state could become another Chernoble. Prevention is not a word (foresight) is a word not politically correct in Nevada.

The Von Schmidt line which divided Nevada from California has never been properly surveyed by a licensed surveyer with a stamp. Even though Senator Mc Guinness and the Legislative Council Bureau have given legal opinion our Commissioners are ignoring the law. The jurisdiction between Pahrump, the County and the Brothels lines as well as the BLM lands are indistinct until they are properly surveyed.

The cost in 1993 for the rail line through Pahrump was \$1.8 billion. Current costs are unknown for Carlin or Caliente but I'll hazard a guess at \$4 billion each. Add this to SAIC's Bechtels number of \$58 Billion for each repository and that is in 2000 dollars.

Abe Van Laik who will be writing the licensing papers for D.O.E. says "A repository should now present public health risk unacceptable to current populations." Sorry Abe, What about our future generations health risks? Is this DOE's policy or our governments???? Read executive order 12866 (52-FF 57735, October 4, 1993) (report included) (Affect on economies of \$100 millic

Transport by rail or truck across and down Nevada is not viable. We Nevadans have absolutely no health protection for ourselves or our friends or families. Our Governor Guinn and our state legislature refuse to modernize and put in intra and inter telecommunications so that we have communication with CDC in case of a catastrophe. We have nothing. We the people of Nevada because of the corruption of our Governor (the FFACO agreement on NTS) and our legislators as well as local county official, in my opinion, we are lost. We can only hope in lieu of the facts that the NWTRB will find (with the help of the TSPA-Sr from the NRC Advisory Comm.) will find YM unsafe. (back of the

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WHAT ARE YUCCA MOUNTAINS

1. For those of us who have followed the progress of the concept of Yucca Mountains it has been a long as well as a learning experience. I hope that this report will influence the NWTRB Board to present a "No Action" report to the Congress because the Y.M. projects are unsafe & financially unsound and all the years of modeling just doesn't get the job done right.
2. When this project started there were environmental concerns. Now we know that every animal, plant as well as the physical environment will be destroyed by radiation and chemical poisoning as well as the rise in temperature of many degrees of the mountains themselves.
3. Yucca Mountains projects are on 25 square miles. It is but a small part of the test site. NTS is 1370 square miles. The NWTRB Board and their friends got the 50 year history of all the testing above ground (100) and underground (928) tests of atomic bombs from 1950 until 1992 when the moratorium was imposed. Many other deadly experiments we performed and continue to be performed including the building where deadly germs (Chemical warfare) can be produced on site. All we have seen at every meeting is modeling of water movement, land movement, volcanic movement, colloid movement, microbic invasion and from what I have heard computer modeling is ALWAYS WRONG. Y.M. is part of the the test site and the chemicals, colloids, radionuclides that flow through the fractures and fissures, earth quakes & other normal flaws that occur in a living moving mountain. The radionuclides and chemicals will flow through the mines no matter what their design and cause catastrophic explosions that could destroy the world because those winds go EAST and that could be the end of the world.
4. We've learned that the mountains will contain 140,000 metric tons of HLMW from the nuclear power plants and 14,000 or more formally classified stuff from DOD that was turned over to DOE. If the drip shield Titanium corroded (Sept. 10- 12 meeting of the board) in just 14 days absolutely no attention has been paid to the DOD stuff (ups..DOE stuff) as to its proper canisterization Alloy 22 has never been properly tested for any length of time with the hot (360° or more nuclear power plant fuel and what about the over a ton of Spent Naval Fuel now at INEEL. YM's contents are supposedly "SAFE" for 10,000 years. In everybook and presentation on the subject (again modeling of radiation projections) there is a disclaimer that says, "We don't know what will happen from the 1st day or the first 300 years." How can you have or ask the public to have confidence in this project. Not common sense....
5. The TSPA-SR when the NRC Advisory Committee reviewed it has found by their

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"adopted an evidence-supported approach and realistic modeling assumption for use....staffs review adequately emphasized waste package failure and in package processes....DOE claims that the packages can perform....for radionuclide transport." Who does the public believe? The NRC AD Board also find in their review...."The consequence is that the TSPA-SR does not provide a basis for estimating margins of safety." These employees (been to their meetings) cannot say out right that YM's are unsafe and that all the modeling is just that modeling, but wouldn't they lose their jobs and generous retirement benefits. (Politically correct is what our systems have become)

5. The affects locally on our biosphere particularly affecting Amargosa & Beat could be devistating. EPA has never tested the cow, their milk, feed, soils or dust or polutants in the air at the largest dairy in Nevada. (7500+ cows) We are finding cancer such as clusters of childhpod lukemias such as the clusters in Fallon and Marion, Ohio are epidemic world wide. The Supreme Courts decision that 1 worker out of 1,000 can be killed by cancers. Has the BOARD asked the employers who that worker is going to be????? You must educate them about the new science of hormesis and how with new instrumentation all NRC & EPA and other health standards on radionuclides will change. My friends living near 3 Mile Island are still living in fear and have serious mental and physical problems. The \$500,000,000 a week economic engine of Las Vegas will be destroyed by this project. What about the 100,000,000 people in 43 states who will be exposed while this hot stuff is being transported? Is there concern for future generations?
6. Our NYE County Commissioners have refused to pay for a proper survey of our towns boundries. If we do not have these proper boundries can DOE commodere our land and foist the rail road through our town? These are real local fears because our leaders are not accountable for our own monies...
7. If the transport of this enormous amount of waste takes 70 or more years to fill both repositories and the repositories must by law remain open in case the government want to retrieve the wasted waste, are there any provisions for Stewardship to monitor the site? How good is security to prevent terrorists from destroy YM's or during transport? I was on the button with \$58 billion for the ONE repository..Add \$4 billion for the Rail road through Pahrump.

REMEMBER THAT ABE VAN LUIK AND I WILL BE SITTING ON TOP OF THE MOUNTAIN PLAYING "OLD MAID" AND "DOUBLE SOLITARE" FOR 200 OR 225 YEARS.... Unless you the NWTRB BOARD USE COMMON SENCE AND recommend "NO ACTION"

Sally Devlin