

13 WYNNE BENTI: My name is Wynne Benti. I'm a
14 resident of Inyo County and own property in Manhattan,
15 Nevada, within a few miles of the proposed Carlin Rail
16 Route and approximately 40 miles north of the proposed
17 Caliente Rail Route.

18 [I am here to support the No Action Alternative
19 to the Yucca Mountain Repository and to the proposed
20 rail routes.] [I oppose the Mina Rail Route for its
21 proximity to the Walker River, Lahontan Reservoir, and
22 Inyo County.] [Ditto for the Carlin Route through the Big
23 Smokey or Monitor Valley, especially the latter, one of
24 the most beautiful and pristine locations in the
25 United States, both located on either side of Manhattan.]

1 ...
continued
below

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1 [I am concerned about the risks of biological
2 and environmental contamination associated with the off-
3 and on-site packaging and unpackaging of spent nuclear
4 fuels, and the transportation of those radioactive fuels
5 to the proposed Yucca Mountain Repository.

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6 The SEIS specifies how to minimize potential
7 accidents or events but not how to deal with such a
8 scenario if one were to occur anywhere on the proposed
9 rail or truck routes.

10 Recent experience shows, from the collapse of
11 a bridge in downtown Minneapolis to the barge dumping
12 oil into the San Francisco Bay, that early federal and
13 local agencies' ability to coordinate and quickly deal
14 with the aftermath of large-scale accidents have been
15 wrought with delays in communication and immediate,

16 critical action.

17 Citing past statistics, the SEIS states that
18 the risk of an accident is small, yet no transport
19 project of this magnitude has ever taken place. There
20 are four DOE sites and 72 commercial sites that will be
21 packaging spent nuclear fuels with applications expected
22 to be submitted to federal regulators for 30 new
23 reactors along the East Coast within the next decade.

24 Should an accident occur during transportation
25 and disposal of spent nuclear fuel and high-level
1 radioactive waste, the SEIS does not guarantee that
2 emergency management would either be swift or
3 effectively coordinated between the various agencies and
4 the public. We assume it would be so.

5 Within the controlled repository setting,
6 trained DOE personnel will be better able to envision
7 and prepare for some accident scenarios, but like the
8 transportation routes, not every event scenario can be
9 envisioned or predicted.]

10 [The EPA has not yet released a safety standard 5
11 for Yucca Mountain. DOE calculates exposures to workers
12 and the public, but there is no existing standard to
13 tell if those will be within allowable limits.]

14 [The SEIS indicates not all of the 72 6
15 commercial sites have or will have the expertise or
16 materials to package the spent fuel in the proposed TAD
17 canisters.] [There is also the question of storage 7
18 longevity from 200 to 10,000 years. Will the proposed
19 TAD storage canisters withstand the test of time and

20 elements and not leak radioactive material?

21 Who is to say that a major geological event at
22 Yucca Mountain is not possible, one in which the stored
23 containers are damaged? What is the remediation
24 scenario for such an event?

25 Nevada is located within one of the most
1 seismically active regions in the United States.
2 According to the Nevada Bureau of Mines, the UNR
3 Seismological Lab, and the Nevada Division of Emergency
4 Management, along with Alaska first, California second,
5 Nevada ranks third as the most seismically active state
6 in the nation with the largest earthquakes (5.0 and
7 larger) over the last 150 years.

8 The average frequency of earthquakes of
9 magnitude 6 and greater in Nevada has been about one
10 every ten years, while earthquakes of magnitude 7 and
11 greater average once every 27 years.

12 Maps produced by Cal Tech, the USGS, and UNR's
13 Seismological Lab show 75,794 seismological events
14 recorded in Nevada between 1898 and 2005 with clusters
15 of 5.0 or greater occurring within the Yucca Mountain
16 Repository area.]

17 [Finally, the DOE considers the possibility of
18 increased amounts of waste going to Yucca Mountain if
19 the Global Nuclear Energy Partnership is adopted. This
20 would expand domestic production to include
21 international nuclear energy production, increasing
22 current estimates of 70,000 metric tons of waste to be

23 transported and disposed of to 130,000 metric tons.]

24 [At this time, I do not feel that all of the ... 1

25 potential risks have been evaluated and that too many
1 questions are still unanswered. Therefore, I support a

Continued

2 No Action Alternative on both the Yucca Mountain

3 Repository and rail construction.]