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cc:
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These are my comments in opposition to the planned Yucca Mountain Repository, with public commentary ending January 10th. Robert Lincoln 194 Columbian Ave. Rutland, VT 05701

- 1 [Please oppose the Yucca Mountain Facility.
It is not isolated from concentrations of human population and activity. Pahrump and Las Vegas NV are among the fastest growing populations in the U.S. Amargosa Valley, at the base of the mountain is home the State's largest dairy, providing milk all the way to Los Angeles. Amargosa Valley shares the aquifer with Yucca Mt.]
- 2 [It is on land controlled by the Federal Government. Some of the land is controlled by the U.S. Air Force and all of it is within the treaty lands of the Western Shoshone nation, ratified by Congress in 1863 and recently upheld by the UN Committee to End Racial Discrimination, naming the Yucca Mt. Project as part of ongoing human rights violation against the Western Shoshone.]
- 3 [Yucca Mountain is in one of the most arid regions in the U.S. When rain does come, it is often in flash floods that travel rapidly. Any escaping radionuclides that reach the surface can travel down the Amargosa River channel. Climate conditions also appear to be changing rapidly and a high-level nuclear waste repository must be able to isolate the waste for hundreds of thousands of years. Throughout the lifetime of the waste, the region is expected to experience future climate cycles that would include ice ages and wetter conditions.]
- 4 [Groundwater beneath Yucca Mountain flows into a "closed" hydrogeologic basin This "closed basin" covers thousands of square miles, and is inhabited by many communities, the Timbisha Shoshone Tribe, and Death Valley National Park, visited by nearly 1 million visitors a year, all of whom rely on groundwater for survival. The Amargosa River, which is fed by all pathways on both sides of Yucca Mt., is considered the

third largest in the western U.S. and parts of it run year round above ground. Research conducted by Inyo County, CA, defines fast pathways from Yucca Mt. to area springs used for drinking water by many.]

5 [Transportation, Aging and Disposal (TAD) Canisters

□ The draft repository SEIS deals primarily with DOE's decision to alter the design of repository surface

facilities to incorporate the concept of Transportation, Aging and Disposal (TAD) canisters. TADs are

intended to simplify handling of spent fuel at the repository by having waste loaded into welded canister at

the reactor sites. Then, using a series of different overpacks, the TADs can be stored at the reactors,

transported to the repository, stored or aged at the repository surface facility, and ultimately disposed of

underground, all without ever having to rehandle the actual spent fuel.

□ While in theory, TADs would simplify repository surface facility design and operations (by reducing the

need for extensive SNF handling facilities), the reality is that the effect is to transfer risks and impacts from

the repository to the reactor locations where the handling operations would take place. The final SEIS needs

to comprehensively assess risks and impacts to workers, facilities, communities and the environment at all

of the reactor locations where TADs would have to be used.

□ TADs also complicate waste transportation. Many reactor sites already have (or are in the process of

implementing) on site dry storage facilities using multipurpose (storage/transport) container systems that are

not compatible with TADs and would require either repackaging of the SNF into TADs prior to transport or

the use of non-standard transport vehicles]

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