



The Toiyabe Chapter of the Sierra Club

Nevada and Eastern California

PO Box 8096, Reno, NV 89507

*One Earth,
One Chance.*

January 5, 2007

RRR000745

EIS Office
Department of Energy
1551 Hillshire Dr.
Las Vegas, NV 89134

Re: draft Repository SEIS and draft NV Rail Corridor SEIS and draft Rail Alignment EIS

Dear DOE officials,

On behalf of the 5,500+ members of the Toiyabe Chapter of the Sierra Club in Nevada and the eastern Sierra, I am submitting comments on the 3 documents concerning the proposed Yucca Mountain Nuclear Repository currently out for public review.

1 I found the documents to be very difficult to review. They appear to be supplements to previous documents, separate but related proposals, or changed proposals. It's difficult to keep score on what has been previously proposed and analyzed, previously rejected, not analyzed before or only partially analyzed, which of our scoping comments or comments on draft EISs apply to which of the current documents or previous documents and why a transportation alternative which has been rejected by the Walker River Paiute Tribe is still analyzed. While we can appreciate the intention to save money and/or time by combining documents and hearings, we believe the DOE has thoroughly muddled the NEPA process on both the Yucca Repository and the transportation options and made it nearly impossible for the public which is not intimately familiar with DOE actions to be able to provide detailed constructive comments in this incomprehensible process.]

2 Purpose and Need: The proposed alternatives fail to provide for permanent storage of nuclear waste in a manner which will protect the public health and safety and the environment. A new system of containers for waste is not described in adequate detail, is not compatible with current waste packaging at nuclear facilities, and would require risky handling at points of origin, in transport, and for some non-containerized waste (how is a "waste storage pool" safe?) at the Yucca facility. These risks, including security needs, are not adequately described or addressed in the documents.]

3 Alternatives: For the draft Repository SEIS, the only alternative which meets public health, safety, and environmental needs is the No Action Alternative. The alternative using TADs is flawed, since the DOE failed to take a hard look at why previous canister proposals were rejected 15 years ago, provided only sketchy design information on the construction, maintenance and durability of TADs, including basic information such as what material will be used for the canisters, how quality assurance will be adequate, and did not fully analyze all potential impacts of their use, including the effects of terrorists' attacks or even human error in the packaging, transportation, and handling of TADs at the Yucca facility. The document failed to provide information on how DOE would "retrieve" TADs for the fifty year required period.]

4 [For the draft NV Rail Corridor SEIS and draft Rail alignment EIS, we were greatly disappointed that
the DOE did not provide adequate information (even detailed maps) on proposed nuclear waste railway
5 routes in 45 states across the county, nor transfer stations, nor types of transport (including rail, road,
6 waterway or some combination), nor provide opportunities for hearings on these routes from locally
7 affected citizens put at special risks.] [We also do not understand why the DOE retained the Mina route
in the document after the tribal council formally objected to the transport of nuclear waste within its
reservation.] [We were astounded to find out that DOE is considering allowing commercial shipping on
the nuclear railways. - an amazingly bad idea.] [We were also disappointed to find little to no
information on the past safety records of railway shipment of nuclear waste.]

8 [Environmental Impacts Analysis: the documents fail to analyze the full range of potential impacts of
the use of TADs and other "new" components of the handling, transportation and storage of nuclear
waste, as described in our comments above. The pollyanna findings of "no risks, no impacts, no
problems" not only does not provide any credible assurance as to the safety or even feasibility of the
proposed actions, but fails to meet NEPA requirements for taking a hard look at all potential impacts.]

9 [In conclusion, we urge DOE to adopt the No Action Alternatives in these EISs.]

Sincerely,



Rose Strickland, Chair
Public Lands Committee