

COVER SHEET

**U.S. DEPARTMENT OF ENERGY
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
YUCCA MOUNTAIN SITE CHARACTERIZATION OFFICE**

Docket Number RW-RM-96-100

**General Guidelines for the Recommendation of Sites for Nuclear Waste Repositories
Notice of Proposed Rulemaking (NPR)**

DISTRIBUTION AT HEADQUARTERS:

Bob Waxman, GC
Chris Einberg, RW
DOE FOI Reading Room
Docket File

CLOSE OF COMMENT PERIOD: Extended again to May 16, 1997

TODAY'S DATE: May 22, 1997

ATTACHED WRITTEN COMMENT(S)/DOCUMENTS:

- 1. Public Written Comments**
 - a. new comments 68 - 91**

- 2. Updated Log Sheets (please recycle previous version)**

Note: The original written comments are located in the official agency docket file currently being held by August Matthusen at the Yucca Mountain Site Characterization Project Office in Las Vegas, NV. Andi Kasarsky is coordinating distribution for DOE Forrestal, (202) 586-3012.

PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes ¹
1	12/24/96	Bob Miller Capitol Complex Carson City, NV 89710	Governor, State of Nevada	
2	1/14/97	William C. Bianchi, PhD 4375 San Simeon Creek Road Cambria, CA 93428 Villa Bianchi@worldnet.att.net	Self	e-mail
3	1/14/97	Nancy Sanders HC60/Box CH210 Round Mountain, NV 89045	Self	
4	1/14/97	Margaret Quinn League of Women Voters PO Box 779 Carson City, NV 89702	President, League of Women Voters of Nevada	xtn/hrgs
5	1/20/97	Dr. Rosalie Bertell 103062.1200@compuserve.com	President, International Institute of Concern for Public Health	e-mail
6	1/21/97	Mary Olson Nuclear Information and Resource Service 1424 16th St. NW, Suite 404 Washington, DC 20036	Nuclear Information and Resource Service	xtn/hrgs

¹ Notes: xtn/hrgs = comment requested extended comment period (xtn) or additional hearings (hrgs).

PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes ¹
7	1/23/97	Frankie Sue Del Papa Capitol Complex Carson City, NV 89710	Attorney General, State of Nevada	
8	1/27/97	Fred Dexter, Jr. Sierra Club - Toiyabe Chapter Sounthern Nevada Group PO Box 19777, Las Vegas, NV 89132	Conservation Committee Member Sierra Club - Toiyabe Chapter Southern Nevada Group	
9	1/29/97	Terri Hale 159 Ortiz Court Las Vegas, NV 89110	Self	
10	1/29/97	Barbara Hanson 159 Ortiz Court Las Vegas, NV 89110	Self	
11	2/3/97	Dr. Robert Bass Innoventech, Inc. PO Box 1238 Pahrump, NV 89041-1238	Self	Fax (5 pages total); Confidential information request
12	2/3/97	Mrs. Ruth Niswander 622 Barbara Place Davis, CA 95616-0409	Self	See #17; Letter also to Secretary

¹ Notes: xtn/hrgs = comment requested extended comment period (xtn) or additional hearings (hrgs).

PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes ¹
13	2/4/97	Richard H. Bryan United States Senate 364 Russell Senate Office Bldg. Washington, DC 20010-2804	U.S. Senator (D-NV)	xtn/hrgs
14	2/5/97	Marty Grey Women's International League for Peace and Freedom P.O. Box 18138 Cleveland, OH 89193-8608	Women Speak Out for Peace and Justice branch of Women's International League for Peace and Freedom	
15	2/6/97	Charles Margulis WESPAC 255 Grove Street, Box 488 White Plains, NY 10602	Co-Chair, Westchester People's Action Coalition, Inc. (WESPAC)	xtn/hrgs
16	2/6/97	Marilyn Elie Adrian Court Cortlandt Manor, NY 10566	Indian Point Project	Phone (914) 739-6164; xtn/hrgs
17	2/6/97	Ruth Niswander 622 Barbara Pl. Davis, CA 95616	Self	See #12
18	2/8/97	Russell Todd 15 Orchard Ct. Roslyn Heights, NY 11577 russtodd@juno.com	Self	e-mail; Letter also to Secretary

¹ Notes: xtn/hrgs = comment requested extended comment period (xtn) or additional hearings (hrgs).

5/15/97

PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes ¹
19	2/14/97	Cathy Rosenfield Tworoses4u@aol.com	Self	e-mail.
20	2/17/97	Michael Borok 378 Barway Drive Yorktown Heights, NY 10598 mborok@pepsi.com [Private_User@pepsi.com]	Self	e-mail; also: borok@aol.com
21	2/19/97	Arch H. McCulloch Jr. Strathclyde Associates 5395 Summertime Drive Las Vegas, NV 89122	Self, Chief Engineer Strathclyde Associates	Phone (702) 453-4757
22	2/19/97	George Crocker 5093 Keats Ave. No. Lake Elmo, MN 55042	Self	xtn
23	2/19/97	Mark Frederickson 900 17th Ave NE Rochester, MN 55906	Self	
24	2/21/97	Willie R. Taylor Office of the Secretary, PEP/MS 2340 U.S. Department of the Interior Washington, DC 20240	Director, Office of Environmental Policy and Compliance Office of the Secretary, U.S. Department of the Interior	Also contact: Dr. Vijai N. Rai, (202) 208-6661
25	2/21/97	Stephen Dwyer smd@wdc.net	Chairman, Southwest Mineral Research Foundation	Phone (714) 731-1335 Letter not sent as e-mail; no other address given

¹ Notes: xtn/hrgs = comment requested extended comment period (xtn) or additional hearings (hrgs).

PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes ¹
26	2/21/97	Mr. Jerry N. Manlove 1500 Park Ave., Apt. 106 Minneapolis, MN 55404-1637	Self; Member, Greenpeace	
27	2/26/97	John Schraufnagel 1506 N. 19th St. Superior, WI 54880	Self	
28	2/26/97	Loya Marie Wells P.O.B. 21255 Santa Barbara, CA 93121	Self	
29	3/3/97	Jennifer Sundance 726 Vernon Ave., #1 Madison, WI 53714	Self	Original to Secretary, dated 2/2/97
30	3/3/97	Linda Ewald 949 Ponder Rd. Knoxville, TN 37923	Self	Original to Secretary
31	3/3/97	Joan O. King 304 Manor Drive Sautee, GA 30571	Self	Original to OCRWM Director; xtn
32	3/3/97	Paul Goettlich Granger, IL gottlich@sbt.infi.net	Self	e-mail

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PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes ¹
33	3/4/97	Mr. Robert Mikes Jr. 3080 Carruth St. Las Vegas, NV 89121	Self	
34	3/4/97	L. Cheryl Runyon and James B. Reed National Conference of State Legislatures 1560 Broadway, Suite 700 Denver, CO 80202	Project Manager(s) - Energy, Science and Natural Resources Program, National Conference of State Legislatures and its High-Level Radioactive Waste Interim Storage and Transportation Working Group	
35	3/5/97	Dan and April Dan1.html dano@accessnv.com	Self	e-mail; no other address given; html link to "Dan and April's Homepage"
36	3/5/97	Bob Breslof bobb@vegas.infi.net	Self	e-mail; no other address given.
37	3/10/97	Judy Treichel Nevada Nuclear Waste Task Force, Inc. 4550 W. Oakey Blvd., Suite 111 Las Vegas, NV 89102	Executive Director, Nevada Nuclear Waste Task Force, Inc.	
38	3/11/97	Nancy & Thomas Wall Carson City, NV 89703-4951 Snow Flower@compuserve.com	Self	e-mail

¹ Notes: xtn/hrgs = comment requested extended comment period (xtn) or additional hearings (hrgs).

PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes ¹
39	3/11/97	Mr. Katreen Romanoff 9813 Kernville Dr. Las Vegas, NV 89134-7876	Self	post card
40	3/12/97	Les Bradshaw MalMurphy@aol.com	County Manager Nye County, Nevada	e-mail; signed original to follow
41	3/12/97	Diana Salisbury 7019 Ashbridge Arnheim Road Sardinia, OH 45171	Sycamore Valley Environmental Awareness Group	Phone (513) 446-3135
42	3/12/17	Hal Rodgers 129 Empire Road Dayton, NV 89403-8076	Co-Chair, The Study Committee Northern Nevada Activities	Phone (702) 246-5994; Original by fax 3/12/97; letter on 3/17/97
43	3/12/97	David Patterson 2816 Darby Falls Drive Las Vegas, NV 89134-7646	Self	Phone (702) 256-4079; Enclosure
44	3/12/97	Mrs. Ethyl Hess Brian 5800 Shawnee Ave. Las Vegas, NV 89107-2600	Self	Enclosures
45	3/12/97	Ralph and Benita Cruz (& 11 other signers) 248 Helmsdale Dr. Las Vegas, NV 89014	Selves	Petition w/ 13 signers; Enclosures

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No.	Date	Name & Address	Title & Organization	Notes ¹
46	3/12/97	Becky Gurka 5303 Stampa Ave. Las Vegas, NV 89102	Self	
47	3/14/97	Joey Latimer Box 444 Idylwild, CA 92549	Self	Original sent to Wendy Dickson [sic], EIS Manager; Form letter
48	3/14/97	Robin Rubens Box 444 Idylwild, CA 92549	Self	Original sent to Wendy Dickson [sic], EIS Manager; See #47
49	3/14/97	Paul Jacobson PO Box 1935 Idylwild, CA 92549-1935	Self	Original sent to Wendy Dickson [sic], EIS Manager; See #47
50	3/14/97	Katherine H. Grigsby [? - illegible] P.O. Box 1944 Idylwild, CA 92549	Self	Original sent to Wendy Dickson [sic], EIS Manager; See #47
51	3/14/97	Chris Sexton P.O. Box 38 Idylwild, CA 92549	Self	Original sent to Wendy Dickson [sic], EIS Manager; See #47
52	3/14/97	Judi G. Milin D.C. P.O. Box 3157 554508 S. Circle Dr. Idylwild, CA 92549	Self	Original sent to Wendy Dickson [sic], EIS Manager; See #47

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5/15/97

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No.	Date	Name & Address	Title & Organization	Notes ¹
53	3/14/97	Joez88@aol.com	Self	e-mail; no other address
54	3/14/97	Janice Flanigan 1460 Bermuda Circle Reno, NV 89509 Janflangan@aol.com	Self	e-mail
55	3/14/95	Bill Magavern and Auke Piersma apiersma@citizen.org	Director (Magavern) and Researcher (Piersma) - Critical Mass Energy Project, Public Citizen	e-mail; letter arrived 3/20/97 Phone (202) 546-4996
56	3/17/97	Marvin S. Fertel Nuclear Energy Institute 1776 I Street, NW Washington, DC 20006-3708	Vice President, Nuclear Energy Institute	letter faxed 3/17/97 Enclosure received on 4/15/97
57	3/17/97	Brad Mettam Inyo County Planning Department 168 North Edwards Street Post Office Drawer L Independence, CA 93526	Inyo County Yucca Mountain Project Coordinator, Inyo County, CA	faxed 3/17/97
58	3/17/97	Richard G. Telfer Educational Directions 5357 Spencer Street, Las Vegas, NV 89119	Owner, Educational Directions	
59	3/17/97	Norma Ellman 106112 Paradise Point Drive Las Vegas, NV 89134-7434	Self	Petition: 135 signatures

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No.	Date	Name & Address	Title & Organization	Notes ¹
60	3/17/97	E. Ramona Trovato U.S. Environmental Protection Agency Washington, DC 20460	Director, Office of Radiation & Indoor Air, EPA	fax 3/17/97; Also contact Albert Colli, (202) 233-9221
61	3/17/97	Dennis A. Bechtel Clark County Las Vegas, NV DAX@co.clark.nv.us	Manager, Department of Comprehensive Planning, Nuclear Waste Division, Clark County, NV	e-mail; letter arrived 3/21/97
62	3/18/97	Francoise Frigole (? - illegible) P.O. Box 1953 Idylwild, CA 92549	Self	Original sent to Wendy Dickson [sic], EIS Manager; See #47
63	3/20/97	Robert R. Loux Agency for Nuclear Projects Capitol Complex Carson City, NV 89710	Executive Director, Agency for Nuclear Projects, Nuclear Waste Project Office, State of Nevada	attachments
64	3/20/97	Alfred K. Whitehead International Association of Fire Fighters 1750 New York Avenue, N.W. Washington, DC 2006-5395	General President, International Association of Fire Fighters	
65	3/20/97	Duane H. Gasaway Lander County 315 South Humbolt Battle Mountain, NV 89820	Manager, Lander County, NV	Phone (702) 635-2885

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PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes ¹
66	3/20/97	Mrs. Georgina K. Traut 30 Cassas Court Reno, NV 89511	Self	
67	3/18/97	Kris & Grace Van Thillo PO Box 1987 Idylwild, CA 92549	Self	Original sent to Wendy Dickson [sic], EIS Manager; See #47
68	3/21/97	Rahl9@IDT.NET	Self	e-mail; no other address
69	3/22/97	Jim Baird 6025 Monashee Way Nanaimo, BC, Canada bairdjr@island.net	Self	e-mail
70	3/25/97	Portitia M. Clark 92 Old Post Road South Croton-on-Hudson, NY 10520	Self	
71	3/28/97	Ms. Barbara Alumbaugh 3955 Swenson St., Apt. 300 Las Vegas, NV 89119-7252	Self	
72	4/2/97	Valerie L. Velez PO Box 3131 Idylwild, CA 92549	Self	Original sent to Wendy Dickson [sic], EIS Manager; See #47

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No.	Date	Name & Address	Title & Organization	Notes ¹
73	4/2/97	Catherine Forman 5404 Wilson Lane Bethesda, Maryland 20814	Member of Stewardship of Public Life of the United Presbyterian Church (USA)	Original to Secretary, dated 3/11/97; response letter from W. Barnes sent 4/11/97
74	4/2/97	Paul Jabcobson PO Box 1935 Idylwild, CA 92549-1935	Self	Original to President; See also #47 - same form letter as "Dickson" letter; see also #49 from Paul Jacobson; response letter from W. Barnes sent 4/11/97
75	4/2/97	Chris Sexton P.O. Box 38 Idylwild, CA 92549	Self	Original to President; See also #47 - same form letter as "Dickson" letter; See also #51 from Chris Sexton; response letter from W. Barnes sent 4/11/97
76	4/11/97	James Quinn 208 Page St. Las Vegas, NV 89110 (702)483-4903 james@intermind.net	Self	e-mail

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No.	Date	Name & Address	Title & Organization	Notes ¹
77	4/15/97	Edward Jopek 3100 Pearl Harbor Dr. Las Vegas, NV 89117	Self	
78	4/15/97	Hal Fox Fusion Information Center, Inc. P.O. Box 58639 Salt Lake City, UT 84158	Editor of <i>Journal of New Energy</i>	
79	4/16/97	Mark Inglis CMI Consulting and Construction 5024 Olympia Dr. Indianapolis, IN 46228 minglis@iquest.net	Owner of CMI Consulting and Construction	Original e-mail sent to President. Response to e-mail by R. Minning sent 4/4/97 (copy attached). Hard copy image of e-mail retrieved from Correspondence Tracking System database
80	4/21/97	Carl J. Paperiello Office of Nuclear Material Safety and Safeguards Nuclear Regulatory Commission Washington, DC 20555-0001	Director, Office of Nuclear Material Safety and Safeguards, Nuclear Regulatory Commission	Fax original NRC point of contact: Michael P. Lee; hard copy forwarded after the fax.
81	4/22/97	Connie Hicks PO Box 267 Eureka NV 89316	Self	Comment written on newspaper article regarding 960

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PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes ¹
82	4/22/97	Marilyn Meyers 4775 S Topaz #112 Las Vegas NV 89121	Self	
83	4/22/97	Mass mailing received of similar postcards/letters from the public. Representative sample provided. 507 received as of 5/14/97. All originals kept with docket file.	Multiple	58 identical postcards received on 4/22/97 184 identical postcards received on 4/23/97 19 identical postcards received on 4/24/97 161 identical postcards received on 4/30/97 13 identical postcards received on 5/1/97 10 identical postcards received om 5/6/97 44 identical postcards received om 5/8/97 11 identical postcards received om 5/12/97 7 identical postcards received om 5/14/97
84	4/22/97	Jarod L. Cohon Nuclear Waste Technical Review Board 1100 Wilson Blvd., Suite 910 Arlington VA 22209	Chairman, Nuclear Waste Technical Review Board	

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No.	Date	Name & Address	Title & Organization	Notes ¹
85	4/23/97	Virginia Sanchez Citizen Alert Native American Program PO Box 5339 Reno NV 89513	Director, Citizen Alert Native American Program	
86	4/23/97	Maria M. Donoso 3375 E Tompkins Ave #114 Las Vegas NV 89121	Self	"Yellow Postcard" identical to those in # 83 mailed in envelope. Also, stapled to envelope was a different type of postcard regarding air quality standards from: Lucille and Joanne Estella PO Box 62 Eureka NV 89316
87	4/24/97	Gaye Mansell 4311 S Rimcrest Dr. Las Vegas, NV 89121	Self	
88	4/28/97	Lucille N. Estella PO Box 62 Eureka NV 89316	Self	Note: Postcard regarding air quality standards stapled to #86 also from Lucille N. Estella
89	5/12/97	Cody Iverson 6916 Megan Ave. Las Vegas NV 89108	Self	

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No.	Date	Name & Address	Title & Organization	Notes ¹
90	5/14/97	Lenore and Sherman Kerner 1713 Breezewood Dr Las Vegas NV 89108	Self	
91	5/14/97	David Doering 8600 W Charleston #1151 Las Vegas NV 89117	Self	

¹ Notes: xtn/hrgs = comment requested extended comment period (xtn) or additional hearings (hrgs).

5/15/97

received
68 3/21/97

To: 10cfr960
cc:
From: Rah19 @ IDT.NET at pmdfpo@YMPGATE
Date: 03/21/97 05:12:00 PM
Subject: Nuclear Waste Dump

New Text Item: FILE.TXT

We don't want a nuclear waste dump at Yucca Mountain especially high level any where our beloved city.

received
69 3/22/97

To: 10CFR960
cc:
From: bairdjr @ mail.island.net at pmdfpo@YMPGATE
Date: 03/22/97 08:19:00 PM
Subject: DOE AND CANADIAN GOVERNMENT UNDERCUT RADWASTE

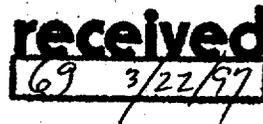


- FILE.TXT

Three Canards Underpinning the Geologic Nuclear Waste Disposal Concept

submitted by:

Jim Baird, Inventor Subductive Waste Disposal Method
Canadian Patent 2,005,376-3, 891213
US Patent 5,022,788, 910611
New Zealand Patent 232248, 900125



March 21, 1997

1. There is international consensus that geologic disposal is the best means of dealing with high-level radioactive waste.
2. The United States and Canada cannot dispose of radioactive waste beneath the seabed because of their commitments under the London Dumping Convention, therefore there is no viable alternative to geologic disposal.
3. Spent fuel bundles from CANDU reactors, located principally in Ontario, are the radioactive wastes of singular consequence to Canadians.

In response to the first two fallacies the following is a proposal being circulated in Japan, by Dr. Masao Kasuya, a researcher specializing in geology and radiation physics who received a Ph.D. in 1987 from the Faculty of Science, Tohoku University. This December, 1996, Internet posting is accessible at (<http://www.sm.rim.or.jp/~kasuya/propen.html>).

Sub-Seabed Disposal Using a Submarine Tunnel

--A solution to High-Level Radioactive Waste Disposal in Japan--

Preface

Among various issues related to high-level radioactive waste (HLW) disposal, final selection of a disposal site is probably the most difficult process both technically and socially. To provide a technical perspective on this issue, I propose a method in which HLW is transported through a submarine tunnel that connects land with a sub-seabed repository, where HLW is isolated from the biosphere within consolidated rock.

Presented here is Masao Kasuya's personal opinion, which contains no intention of bringing about benefits to any particular groups or institutes. Being a freelancer, I do not belong to any of the nuclear

advocate groups, antinuclear groups, research institutes, or governmental agencies. I deem myself being in a neutral position.

Deep-sea environment is suitable for reconstructing Quaternary history

To ensure the isolation of radionuclides from the biosphere, a geologic repository of HLW should be located in an area without significant influence of groundwater movement, crustal movement, weathering, erosion, or volcanic activities. It may be possible to find a site that satisfies the above requirements in the terrestrial region of Japan. However, HLW requires an isolation period of 10,000 to 1,000,000 years. The need for evaluating whether suitable conditions will last for a long period is the most difficult aspect of HLW disposal.

To predict as reliably as possible changes in geological environments up to thousands of years from now, the Quaternary history (about 1.7-million years ago to the present) of the area around a proposed site has to be reconstructed as completely as possible both chronologically and spatially. The Quaternary history is recorded in beds deposited during the Quaternary period. However, Quaternary beds distributed on land tend to be discontinuous both chronologically and spatially, because they tend to vary widely in depositional speed and they are subject to weathering, erosion, and biological disturbance including human activities. Thus, it would be very difficult to reconstruct a continuous Quaternary history of the area around a land-based repository.

On the deep-sea floor, on the other hand, it is not as difficult to find regions where Quaternary beds are continuously distributed both chronologically and spatially. This is because deep-sea environments tend to be more stable with constant depositional speed. In these regions, future environment can be predicted more reliably based on continuous historical records. ("Deep sea" in this proposal refers to sea areas having depths of more than 1000 m.)

Additional advantages of sub-seabed disposal

Other than the feasibility of future prediction, a sub-seabed HLW repository has the following advantages.

First of all, groundwater is inactive in deep-sea sedimentary beds. Minimal influence of groundwater is the top requirement in securing isolation of radionuclides from the biosphere.

Another advantage of sub-seabed disposal is a greater natural barrier to

isolate radionuclides. In general, groundwater becomes more inactive and natural barriers become more massive with increasing ground depth. At the same time, temperature increases with depth, and elevated temperature may degrade the performance of artificial barriers. Thus, HLW repositories are generally planned to be located within 1000 m from the ground level. In the case of a sub-seabed repository, there is a natural barrier of a thick seawater layer in addition to the sedimentary beds beneath the deep-sea floor. Calculating from the density ratio, a mass of 1000-m-thick seawater corresponds to a load of 400-m-thick rock, which means a dramatic enhancement of natural barriers.

Further advantages of a sub-seabed repository over a land-based repository include robustness against glaciation and meteoritic impact, higher security due to lower human accessibility, and feasibility of site procurement due to the remoteness from human habitations.

Problems in sub-seabed disposal

While various concepts of sub-seabed disposal have been proposed, two methods have received particular attention: a method of burying torpedo-shaped canisters containing HLW into unconsolidated sub-seabed sediments by free falling, and a method of emplacing strings of waste canisters in holes drilled into bedrock. An international team including Japanese scientists was organized to make a general survey of the ocean floor from mid-1970s to mid-80s. The free-fall penetrator method appeared more practical because the drilled-hole emplacement method would require higher technology and costs.

However, there is a large body of people, including environmentalists, who oppose the use of the open sea for waste disposal. Their argument is often based on the London Dumping Convention (Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter). While dumping of HLW into seawater is definitely prohibited by the convention, the status of sub-seabed disposal has been ambiguous. There are predominant arguments that isolation of wastes within unconsolidated sediments beneath the ocean floor should also be considered as "dumping." Because of this political difficulty, most nations have withdrawn from research and development of sub-seabed disposal, and have narrowed their options to land-based disposal.

Sub-seabed disposal using a submarine tunnel

Although the world trend is toward the option of land-based disposal, I doubt whether restricting repositories to land-based sites really helps prevention of sea pollution. If radionuclides from a land-based

repository leached out to the surface, they would quickly be transported to the sea by surface water. What is essential is to isolate radionuclides from the biosphere as reliably as possible. If sub-seabed disposal results in more reliable isolation, sub-seabed disposal must be deemed as a better option to prevent sea pollution.

To make use of the technical advantages of sub-seabed disposal, I propose a method in which HLW is transported through a submarine tunnel that connects land with a sub-seabed repository, where HLW is isolated from the biosphere within consolidated rock. This method takes into consideration technological feasibility, protection of marine environments, and availability of international understanding.

The United Nation Convention on the Law of the Sea delineates that a coastal state is granted sovereign rights to utilize all resources in water and under the seabed within its exclusive economic zone (EEZ), which can extend from the coast line up to 200 nautical miles (about 370 km) offshore. Within Japan's EEZ, a proposed HLW repository would be constructed in sedimentary rock a few hundred meters beneath the seabed that lies more than 1000 m beneath the sea surface. Waste packages would be transported through a submarine tunnel connecting land with the sub-seabed repository. Sea pollution by an accident during disposal work would be improbable because wastes would never go through seawater during the work. Although the repository would lie beneath the ocean floor, the knowledge accumulated from research and development of geologic disposal can be made use of because the proposed method is a variation of geologic disposal. Long-term monitoring is also possible by maintaining the access tunnel for some time after constructing artificial barriers.

As exemplified by the Honshu-Hokkaido tunnel, Japan is in the forefront of tunneling technology. Because the Honshu-Hokkaido tunnel has a whole length of about 54 km (submarine section is about 23 km), the technical feasibility of constructing a submarine tunnel with a length of a few tens of kilometers has already been demonstrated. Within tens of kilometers off the Japanese coasts, there are many submarine basins of more than 1000 m in depth; this situation would allow us to select the most suitable site after studying multiple candidate sites. In many respects, Japan is in a favorable environment to implement the proposed method.

Final remarks

Not only technical but also political factors exert considerable influence upon the decision making of HLW disposal. We must be aware

that the political environment can change in many ways over thousands of years while natural laws remain unchanged. Instead of easily giving way to political feasibility, we should place more importance on technical soundness, and should try to change the political environment if necessary. The essential thing is to carry out HLW disposal without leaving a burden to our descendants. We are now at a crucial turning point in the course of designing the concept of HLW disposal. We should be open-minded to different proposals and avoid making hasty decisions. I believe sub-seabed disposal using a submarine tunnel deserves serious consideration by planners of HLW disposal.

Besides pursuing the best approach from a technical point of view, making an effort to gain public acceptance is also important. In Japan, research and development of HLW disposal is led by Power Reactor and Nuclear Fuel Development Corporation, which is a nuclear advocate corporation. I have no intention to discourage efforts by nuclear advocates to find a sound solution to HLW disposal. However, if only nuclear advocates are involved in the process of site selection, they will have to face great difficulty in gaining final acceptance from the public regarding the construction of a repository. HLW disposal is a common issue of human beings regardless of their stance toward nuclear development. Constructive suggestions from environmental groups and neutral research institutes are badly needed. Governmental support for research activities of a wide range of groups will be a key factor in gaining public acceptance at the final stage of HLW disposal.

Lastly, I would like to thank Mr. J. R. Baird (bairdjr@island.net) of British Columbia, Canada for providing useful information and sharing his insight.

Send comments to kasuya@sm.rim.or.jp

As a consequence of the DOE's and Canadian government's eight year campaign to undercut the subductive waste disposal method, which would safely ameliorate the nuclear waste problem, Albertans, British Columbians and Americans in the northwest have been placed at extreme environmental risk. See also, The Subseabed Solution, by Steven Nadis, 10/96 Atlantic monthly, website (<http://www.TheAtlantic.com/atlantic/issues/96oct/seabed/seabed.htm>)

In the 104th US Congress, House Resolution 1924 proposed to make Hanford, Washington, the western US site for temporary storage, by default permanent disposal, of spent nuclear fuel from US reactors. This resolution stemmed from a growing recognition that Yucca Mountain, in Nevada, is a less than brilliant location for a US repository and the

fact that the US government has no fallback position should Yucca Mountain not pan out. This tact is likely to be pursued in the current Congress. The rationale is that Hanford, at the doorstep of British Columbia and Alberta, has been degraded to such an extent already, it should be deemed a national sacrifice zone.

Without Yucca Mountain, critics fear that Hanford will become the site of choice for nuclear waste from other federal facilities. In fact, the DOE has drafted nine environmental studies that include Hanford as a site for additional and nuclear hazardous materials. . . We don't know what the risks are from all these decisions. They're being piecemealed, the public's not being shown what the risks are in just one place at one time, with one public hearing. Instead, we're being told we'll take it one step at a time, and all the steps look like a trail converging on Hanford. Excerpts from a June 10, 1996 transcript, HAZARDOUS LEFTOVERS, by Rod Minott of KCTS-Seattle reporting from Hanford, Washington.

In a December 9, 1996 press release, The Department of Energy laid out a dual-track strategy to irreversibly dispose of the nation's surplus plutonium and to reduce from seven to three the number of sites where nuclear weapons materials are stored. DOE also will enhance the safety of weapons dismantlement at its Pantex Plant in Texas and diversify the Nevada Test Site for civilian uses, including a major solar energy project, while maintaining its nuclear test readiness activities.

"Today's actions will reduce global nuclear danger. For five decades, the United States built up a huge stockpile of plutonium - the deadly stuff of nuclear weapons. Today, we begin to destroy it. We have a clear message to the world: we are committed to irreversible nuclear reductions and we will ensure that surplus plutonium is never again used for nuclear weapons," Secretary of Energy Hazel R. O'Leary said.

A significant challenge arising from the end of the Cold War is the need for safe, secure and verifiable management of weapons-usable highly enriched uranium and plutonium from the disassembly of nuclear weapons. Global stockpiles of these materials pose a danger to national and international security if they are not managed and disposed of in a manner that precludes their reuse in weapons. As described in the Storage and Disposition of Weapons-Usable Fissile

Materials Final Environmental Impact Statement announced today, DOE's strategy for managing these materials is to reduce the number of locations where they are stored and to pursue a dual-track plutonium disposition strategy that allows for immobilizing plutonium in glass or

ceramic forms and burning plutonium as mixed oxide fuel in existing reactors.

Of the three sites where surplus plutonium will be stored, MOX will be produced, plutonium pits will be disassembled and plutonium will be vitrified, Hanford and the Idaho National Engineering Laboratory are in Alberta and British Columbia's backyard.

As part of Gov. Batt's deal with the Federal government, Idaho will become a nuclear waste dump for the world. Nuclear waste from England, Mexico, Japan, Italy, Finland, Germany and 13 other countries is headed for the Idaho National Engineering Laboratory. Shipments could start in 1997.

A BRIEF HISTORY

On October 16, 1995, without consultation with the Idaho Legislature or the people he was elected to represent, or with the Idaho Legislature, Gov. Phil Batt signed a back-room, loophole-riddled deal with the Federal government. The deal granted the Federal government the right to ship 1,133 shipments of nuclear waste for "temporary" storage at the Idaho National Engineering Laboratory (INEL), a facility located in Idaho's southern desert, which had served as a nuclear research facility since the 1940's.

As their part of the deal, the Federal government said it would remove most of the waste it had accumulated at the INEL for the last 50 years. If the waste isn't removed by the year 2035, the Federal government will pay a fine.

As the people of Idaho soon discovered, the deal signed by Governor Batt and Attorney General Al Lance offered no protection for the state.

It made Idaho the first state to agree to take nuclear waste, allows the entire deal to be renegotiated as soon as two shipments leave Idaho, contains no environmental protections, trades low-level transuranic waste (mostly contaminated uniforms and equipment produced at the site) for high level spent fuel that is 6000 times more radioactive, requires Idaho to accept nuclear garbage from 19 foreign countries, calls for construction of a privately owned mixed-waste incinerator that will bring thousands of additional shipments of nuclear and chemical waste into Idaho where it will be burned, threatening the air quality in the entire region.

Not even the deadlines written into the deal carry any weight. The

Federal government itself describes them as non-enforceable.

And the fine is so laughably small (\$60,000 a day in 2035) compared to the cost of shipping the nuclear waste out of state, it amounts to nothing less than cheap rent to leave the waste where it is.

The contract doesn't have enforcement or penalty clauses that penalize the Federal government for not paying the fine at all. Furthermore, no contract can force a future Congress to allocate funding for any reason, by law. The funding for removing Idaho's waste depends entirely on a Congress that will be elected decades in the future, dealing with budgets we can only guess at now, and controlled, as always, by more politically forceful areas of the country. From the Stop the Shipments/Yes on 3, a grassroots, nonpartisan campaign created to fight this one-sided deal, web site at URL (<http://home.rmci.net/sts/INDEX.HTM>).

Rather than relegating these hazardous materials to sites with no better credentials than the fact that they are owned by the Department of Energy, which has ruined them and now wishes to proclaim them sacrifice zones rather than clean them up, the subductive waste disposal method would safely rid the U.S. of its high-level wastes as well as Canada of its spent fuel and would afford inaccessibility to all eliminated weapons materials.

Jim Baird
6025 Monashee Way
Nanaimo, BC, Canada
V9T 6A4
Email bairdjr@island.net
<http://www.island.net/~bairdjr/>

Portia M. Clark
92 Old Post Road South
Croton-on-Hudson, NY 10520

March 13, 1997

April V. Gil
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P. O. Box 98608
Las Vegas, NV 89193-8608

received
#70 3/25/97

Dear Ms. Gil:

I've been directed to your office by a letter from a well-informed and concerned resident of this area, which appeared in a local newspaper. "This area" is New York State, within a ten-minute drive from the infamous Indian Point nuclear plants.

A little more than a year ago, I went on a tour of Indian Point #3, which was then "down". We were herded through the plant by a group of "suits" - those many, well-paid promotional types who reassuringly laughed and said there was more nuclear danger in our backyards than in the plants. That is patently untrue, and nothing that we learn of the errors and problems at these plants alleviates our concern.

And now there arises the problem of what to^{do} with the waste from these and all other plants in the U.S. The very evident fact that no one who is involved in the manufacture of nuclear power has the faintest idea of what to do with the waste is frightening. But the misguided and extremely dangerous idea of transporting this waste across the country is a tocsin pealing out alarm to any and every concerned citizen. There is no reason to believe that those who would have it moved - those who would actually move it - have any more depth of knowledge about how to do these things than the management of Indian Point #3 has about how to run the plant.

The people in Nevada don't want the waste, nor do we. But it is imperative that SOME sane thinking has to be done about how to store it on site SAFELY; and then the plants must close.

American voters and tax-payers are not stupid - and we refuse to pay for the egregious mistakes of a few "power-hungry" industrialists and government offices who would bend the laws to accommodate their ill-conceived use of a disastrous power source.

Sincerely,



March 30 1997

Touchen if meet concern or April,

Hi, my name is Barbara, I'm a concerned

citizen that lives in Las Vegas, Nevada. In

worried about the many ^{regeneration} precautions +

threats I face our state + city if we put the

dump site at Yucca Mountain. I've read this last

weekend and was about the dangers of accidentally

spilling the containers what it could do to the

land, people around the spill + the poison drinking,

Also if we put it there we are again claiming

land that they don't belong to us it belongs to

the Western Shoshone Indians, I think that we have already

taken enough from Nevada by putting the test site

here we are downwinders of what ever goes on there

and our city is growing very fast I worry about

all the children that will be here in 40 or 50 yrs

when and if this state from clear across the united

States comes here we are in a way saying we don't

care about you we just need to get rid of this

and its a desert land out here no one comes here

we do come here and I think we should spend

out money in trying to find another way of disposing

of this stuff or put it away and not make the

waste what we have of it should stay where they

made it or get someone to disintegrate it somehow

in writing because I enjoy the desert very much

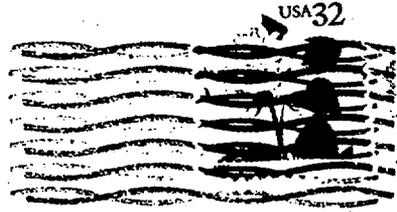
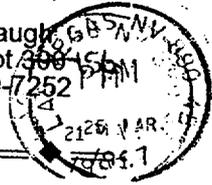
I don't gamble much and going to the mountains

is very enjoyable for me, I do hope you will

take this into consideration not only for our
children + people living here now but for all those
that we are continually building for in the future
Also needed is the halt of Substantially test for
at the plant itself. we need no more weapons in
our sky and age we need to make peace with
our neighbors + our land be for we lose them
with.

Thank you
Benjamin Stubb
(concerned citizen)

Ms Barbara Alumbaugh
3955 Swenson St Apt 308
Las Vegas NV 89119-7252



April 1982
US Department of Energy
Office of Civilian Radioactive Waste
Management
Yucca Mountain Site
P.O. Box 924
Las Vegas, NV 89119



Wendy Dickson
EIS Manager
U.S. Department of Energy
1180 Town Center Drive
Mailstop 010
Las Vegas, Nevada 89134

2-28-97

3/21/97
Debra Wilcox
Bonnie Foght
Susan Rives

received
#72 4/2/97

Dear Wendy Dickson,

I am writing to you in regards to the proposed Yucca Mountain Nuclear Waste Repository. There are a number of concerns I have concerning the way this is being handled. First it is very alarming that the D.O.E. is changing the regulations that are necessary to determine if the site is suitable.

By doing so the DOE is undercutting any remaining scientific credibility in a decision to develop Yucca Mountain. Secondly DOE needs to consider the transpiration of waste to the sight.

The transportation of nuclear waste to the sight impacts at least 43 states. Over 50 million Americans live within a half mile of projected waste routes. Thirdly, the D.O.E. should preserve specific technical parameters that will qualify or disqualify Yucca Mountain, and these should be the same as those applied to any other site. There should be no compromise when it comes from the isolation of nuclear waste and the environment. I urge you to insure that any decision that effects the next 12,000 generations be made with regulations as stringent as possible and the best work possible from our government.

Sincerely,

Valerie J. Velez
PO Box 3131
Idyllwild CA
92549

RECEIVED
APR 1 1997

received
73 4/2/97

CATHERINE FORMAN
5404 Wilson Lane
Bethesda, Maryland 20814

March 11, 1997

Secretary Federico Pena
U.S. Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

Dear Mr. Secretary:

I have read about the difficulty of siting a permanent facility for the disposal of high-level nuclear waste -- difficult for many reasons, principally the dangers of radioactivity discharge in water, air, and ground as nuclear waste accumulates.

I urge you to have the Department of Energy **withdraw its proposed revision of the guidelines** for siting a permanent nuclear waste storage. The Yucca Mountain site, or any other chosen site, should not be decided on without the careful consideration of socioeconomic and environmental consequences, transportation factors, and justice to people affected, in order to make the permanent facility as secure as it can possibly be against foreseeable accidents and unhealthy consequences.

I urge you to set guidelines that can reduce damage to the planet and its people.

Sincerely yours,

Catherine Forman

Catherine Forman
Member of Stewardship of
Public Life of the United
Presbyterian Church (USA)

AGLIAS #2

DJ

received
74 4/2/97

President Bill Clinton
The White House
Washington D.C. 20510

Dear President Clinton,

I am writing to you in regards to the proposed Yucca Mountain Nuclear Waste Repository. There are a number of concerns I have concerning the way this is being handled. First it is very alarming that the D.O.E. is changing the regulations that are necessary to determine if the site is suitable.

By doing so the DOE is undercutting any remaining scientific credibility in a decision to develop Yucca Mountain. Secondly DOE needs to consider the transpiration of waste to the sight.

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Sincerely,



CPD
16/16

President Bill Clinton
The White House
Washington D.C. 20510

received
75 4/2/97

Dear President Clinton,

I am writing to you in regards to the proposed Yucca Mountain Nuclear Waste Repository. There are a number of concerns I have concerning the way this is being handled. First it is very alarming that the D.O.E. is changing the regulations that are necessary to determine if the site is suitable.

By doing so the DOE is undercutting any remaining scientific credibility in a decision to develop Yucca Mountain. Secondly DOE needs to consider the transpiration of waste to the sight.

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Sincerely,



received
4/11/97

To: 10CFR960
cc:
From: james @ intermind.net at pmdfpo@YMPGATE
Date: 04/11/97 06:18:00 AM
Subject: Do not water down nuclear repository selection guidelines

New Text Item: FILE.TXT

April 11, 1997

April Gil
U.S. Department Of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
e-mail: 10CFR960@notes.ymp.gov

Dear Ms. Gil:

I am writing in regard to proposed changes to 10 CFR 960.

It is obvious to anyone reviewing this process that you have determined that Yucca Mountain cannot meet the current site selection guidelines, and so rather than scrapping the project, which would be the right thing to do under those circumstances, you intend to change the guidelines.

The Department of Energy and the Yucca Mountain Project in particular have done much to waste any confidence the public might have had in their judgment, and very little to restore it. I have to wonder at this point why you would still bother to make a pretense of caring about the environmental and public health impacts of your activities. If you're going to write your "guidelines" to match whatever site you happen to choose, why make a cynical pretense of "assessing" the site at all? Why not just dig a big hole, write a set of "site selection guidelines" describing your hole in detail, and dump it in?

Imagine if this procedure were used in building airplanes. "This proposed design doesn't meet safety standards, but we've invested billions in it already, and all that money would be wasted if we scrap it. So the obvious solution is ... to change the safety standards! We don't care how many fiery crashes we cause, as long as we get our money's worth!"

Do not water down the guidelines. If Yucca Mountain cannot isolate the waste naturally, find a place that can. If no place can, then find another technology for isolating the waste. It is wrong to put the public in danger to protect the profit margins of commercial nuclear waste producers.

Sincerely,

James Quinn

208 Page St.
Las Vegas, NV 89110
(702) 438-4903
james@intermind.net

received
77 4/15/97

4/5/97

DOCKET NO RW-RM-96-100
RE: THE BURIED YUCCA MT. PROJECT IN THE R.J.
ATT: APRIL GIL

THE ATTACHED REQUEST, BY THE DOE
FOR COMMENTS ABOUT YUCCA MT. AS A
REPOSITORY, SOUNDS LIKE A LOT OF DOUBLE
SPEAK WRITTEN BY A BUNCH OF LAWYERS.

YEARS AGO LAWYERS GOT PAID BY THE
WORD, NOW THEY GET PAID TO CONFUSE THE ISSUES.

IN MY OPINION THESE AMENDMENTS ARE
ARE A REAL SLICK ATTEMPT TO HIDE YOUR
GOAL BY NOT CONSIDERING ALL TECHNICAL
ASPECTS AT THE SAME TIME. FOR A NUMBER
OF YEARS NOW, NOBODY, OR AN INVESTIGATIVE
GROUP HAS BEEN ABLE TO SAY, "PUTTING THE
WASTE IN YUCCA MOUNTAIN WILL BE SAFE,"

WHAT YOU WANT TO HEAR IS: YES,
IF YOU DEPOSIT WASTE AT YUCCA, IT WILL
PROTECT HEALTH + SAFETY. ^{PERIOD} DON'T TELL JOE
6 PACK THAT IT'S FOR OTHER AREAS OF
THE COUNTRY AND THE WORLD, BUT NOT US
LOCAL NEVADANS.

(2)

4/5/97

IF AN EARTHQUAKE OCCURS NEAR YUCCA,
WILL THE MOUNTAIN ADEQUATELY CONTAIN
THE WASTE, OR COULD THE WASTE LEACH
INTO THE UNDERGROUND WATER SUPPLY
FOR LOWER NEVADA? COULD THE WASTE
CAUSE PROBLEMS IN OTHER WAYS? WOULD IT
BE A PROBLEM FOR PEOPLE LIVING IN THE
WINDWARD AREAS FROM YUCCA MT.? WHAT
ELSE COULD HAPPEN THAT THE PUBLIC
DOESN'T KNOW ABOUT?

IF ALL (ALL) THE TECHNICAL ASPECTS
THAT COULD CAUSE A FAILURE AREN'T
CONSIDERED (ALL) AT THE SAME TIME, THEN
I'M AGAINST PUTTING ^{NUCLEAR} WASTE AT YUCCA MT.
NOW, OR IN THE FUTURE.

RESPECTFULLY YOURS,
Edward Jopek
3100 PEARL HARBOR DR.
LAS VEGAS, NV 89117

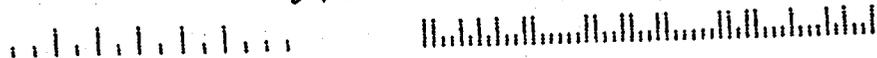
CC REVIEW JOURNAL

E. JOPEK
3100 PEARL HARBOR DR.
LAS VEGAS NEVADA 89117



U.S. DEPARTMENT OF ENERGY
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
YUCCA MOUNTAIN SITE CHARACTERIZATION OFFICE
DOCKET NO. RW-RM-96-100,
P.O. BOX 30307
LAS VEGAS, NEVADA
89036-0307

ATTENTION: APRIL GIL



FUSION INFORMATION CENTER, Inc. (FIC)
P. O. BOX 58639
SALT LAKE CITY, UT 84158
Telephone: (801) 583-6232
Fax: (801) 583-2963 (58-FAXME)



April 2, 1997

April Gil, U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
Docket No. RW-RM-96-100,
POBox 30307
Las Vegas, NV 80036-0307

SUBJECT: COMMENT ON YUCCA MOUNTAIN REGULATIONS

TO: Whom it May Concern

The mission of the DOE should include the optimal means of handling high-level radioactive waste with minimal risk to U.S. citizens in all echelons of processing. If the high-level radioactive waste can be ameliorated **on site**, then the combined risks of packaging, transporting, and geologic storage are removed. **The purpose of this letter is to inform you that technology now exists by which high-level radioactive wastes can be ameliorated.**

Contrary to the findings of the National Research Council, as published in the book Nuclear Wastes, Technologies for separations and Transmutation, there is a better method than geologic storage. The purpose of this letter is to inform you that such technology now exists to greatly reduce the radioactivity of radioactive slurries and solids. This new technology can be implemented at a fraction of the cost of packaging, transporting, and geologic storage.

This technology is being developed by three private groups and as of March 1997 had been given to a major university for independent replication. No government funds have been provided for the development of this technology **mainly because the technology had not been independently replicated.** However, the theory for the technology has been developed by one of the three groups and is now being evaluated by nuclear physicists associated with one of the National Energy Laboratories.

At the present time there is insufficient information as to the effect of high-level nuclear wastes on the encapsulating materials used to contain and/or transport these high-level radioactive materials. Therefore, there is inadequate assurance that the storage facilities in Yucca Mountain can protect the health and safety of the public. In

addition, there is inadequate assurance that such high-level radioactive materials can be packaged, transported, and delivered to Yucca Mountain without civilian risk.

In view of these risk factors, **but more important, because there is new technology available to remove most of the risks of packaging, transporting, and storing high-level radioactive wastes**, this on-site treatment process should be immediately and thoroughly investigated.

Our staff is ready and willing to help the DOE achieve its mission of handling the radioactive high-level wastes in a manner that should be the most politically acceptable, the safest, and the most economical. This new technology is scientifically correct (meets the requirements of standard nuclear physics), is politically the correct choice, and eliminates most of the hazards to the public that are entailed in the currently proposed process of packaging, transporting, and long-term storage. In addition, this new technology is expected to be far less expensive.

We strongly encourage the DOE to plan immediate proof of and support for on-site amelioration of all high-level radioactive wastes.

Sincerely,



Hal Fox, Editor, *Journal of New Energy*

cc: Utah's Senators and Utah's Congressmen and other political leaders.

P.S. For the latest technical and professional papers see Volume 2, Numbers 3 & 4 of the *Journal of New Energy*. Here are the most important references:

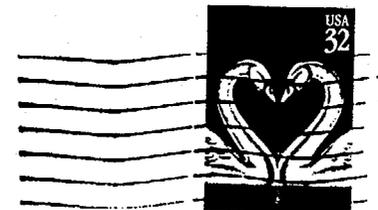
Ken Shoulders & Steve Shoulders, "Observations on the Role of Charge Clusters in Nuclear Cluster Reactions", *J. of New Energy*, vol 1, no 3, pp 111-121, Fall 1996.

Robert Bass, Rod Neal, Stan Gleeson, & Hal Fox, "Electro-Nuclear Transmutation: Low-Energy Nuclear Reactions in an Electrolytic Cell", *J. of New Energy*, vol 1, no 3.

Hal Fox, Robert W. Bass, Shang-Xian Jin, "Plasma-Injected Transmutation", *J. of New Energy*, vol 1, no 3, Fall 1996, pp 222-230, 23 refs, 4 figs.

Shang-Xian Jin & Hal Fox, "Characteristics of High-Density Charge Clusters: A Theoretical Model", *J. of New Energy*, vol 1, no 4, Winter 1996, pp 5-20, 16 refs.

FUSION INFORMATION CENTER
P. O. BOX 58639
SALT LAKE CITY, UTAH 84158-0639



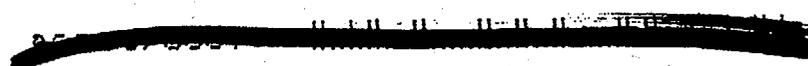
*Attention
April Gil*

US. Dept. of Energy
Yucca Mountain Site Characterization
office - Attn: April Gil

Docket No RW-RM-96-100

PO Box 30307

Las Vegas NV ~~89036-0307~~





From minglis@iquest.net Thu Feb 6 09:32:20 1997
 Date: Thu, 06 Feb 1997 09:32:41 -0700 (MST)
 Date-warning: Date header was inserted by STORM.EOP.GOV
 From: Mark Inglis <minglis@iquest.net>
 Subject: High level nuclear wastes
 X-Sender: minglis@pop.iquest.net
 To: president@WhiteHouse.GOV
 Message-id: <01F3AABCQA2007IO2@STORM.EOP.GOV>

received
 79 4/16/97

Dear Mr. President,

Please oppose S. 104, any similar legislation in the house, and the DOE proposed rule explained below.

On January 21, Sen. Craig (ID) introduced S 104, a bill to amend the Nuclear Waste Policy Act of 1982. The bill would establish a "temporary" storage site for high-level waste at Yucca Mountain, NV, part of the traditional lands of the Western Shoshone Nation. A hearing on S 104 was scheduled for February 5, and the Senate Energy and Natural Resources Committee hopes to send the bill to the floor for a vote as quickly as possible. A companion House bill is expected to be introduced by Rep. Upton (MI), who sponsored similar legislation in the 104th Congress.

Yucca Mountain is also being considered by the Department of Energy (DOE) as a potential permanent storage site. On December 16, the DOE issued a proposed rule which would exempt Yucca Mountain from standards that apply to other high-level waste dumps. For example, the proposed rule would no longer require a consideration of the potential impact of transporting the waste to the site.

The deadline for comment on this proposed rule is February 14.

The Western Shoshone National Council opposes designation of Yucca Mountain as a nuclear waste storage site AND SO DO I. They assert that the program would violate the 1863 Treaty of Ruby Valley.

Please reject this proposed rule by the DOE, as I do.

For more information, contact the Nuclear Information and Resource Service, 1424 16th St. NW, Suite 404, Washington, DC 20036; ph: (202) 328-0002; FAX (202) 462-2183.

Thank you very much,

Mark Inglis - Owner
 CMI Consulting & Construction
 5024 Olympia Dr.
 Indianapolis, IN 46228
 Mark Inglis



Department of Energy

Washington, DC 20585

April 4, 1997

Mr. Mark Inglis
CMI Consulting & Construction
5024 Olympia Drive
Indianapolis, IN 46228

Dear Mr. Inglis:

This is in response to your electronic mail message of February 6, 1997 to President Clinton, urging him to oppose S. 104, the Nuclear Waste Policy Act of 1997. The Administration has stated its opposition to S. 104, and President Clinton has said he would veto the bill as it was reported out of the Senate Energy and Natural Resources Committee on March 13, 1997.

In reference to the Department's proposal to revise the siting guidelines for the recommendation of sites for a geologic repository, we would propose to rely on siting guidelines for the Yucca Mountain site that are based on the overall performance of the repository system, rather than separately evaluating individual aspects of the site that were originally created for the purpose of comparing several candidate sites for a geologic repository. This approach would provide that a total system assessment of the performance of a proposed site-specific repository design within the geologic setting of Yucca Mountain be compared to the applicable regulatory standards to determine whether this site is suitable for development as a repository. Your comments will be considered as part of the rulemaking process as the Department continues to collect public comments on this important issue. With respect to your concern about transportation, potential transportation impacts will be addressed and documented in the Repository Environmental Impact Statement being prepared by the Department under the guidance of the National Environmental Policy Act.

Thank you for your interest in the civilian radioactive waste management program. If you would like additional information, please contact our Yucca Mountain Site Characterization Project Office at P.O. Box 30307, North Las Vegas, NV 89036-0307.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. Minning".

Richard W. Minning
Office of the Director
Office of Civilian Radioactive
Waste Management



THE WHITE HOUSE
WASHINGTON

3/14/97
DATE

MEMORANDUM FOR:

DOE, 21

FROM:

SUE J. SMITH *SV*
DIRECTOR, OFFICE OF AGENCY LIAISON

SUBJECT:

REFERRAL OF CASEWORK IN BULK

An unprecedented number of individuals still write the President and the First Lady for help. I know that this has meant a far greater volume of mail for your agency than ever before. I appreciate your continuing cooperation in our efforts to be as responsive as possible.

The attached letters have not received a White House Staff response. I am forwarding this correspondence to your agency for any appropriate action.

Please return the original incoming letter, along with a copy of any written or telephone response, to me at the address below. I also would appreciate your sending a copy of your agency's log of the names and addresses of these individuals. Any misreferrals should be returned to my office. If you have questions you can reach me at 456-7486.

Sue J. Smith
Director, Office of Agency Liaison
Room 5, OEGB
The White House
Washington, D.C. 20500

Again, thank you for your continuing help.

received
#80 4/21/97



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

FAXED FROM
THE
DIVISION OF WASTE MANAGEMENT
(DWM/NMSS)

FAX NUMBER: (301) 415-5399

VERIFICATION: (301) 415-7208

LOCAL: _____

LONG DISTANCE: _____

1. APRIL GIL

FAX #: 702/794-1428

LOCATION: _____

VERIFY: _____

2. _____

FAX #: _____

LOCATION: _____

VERIFY: _____

3. _____

FAX #: _____

LOCATION: _____

VERIFY: _____

NUMBER OF PAGES 3 PLUS COVER SHEET

FROM: Mike Lee

PHONE: _____

MAIL STOP: _____



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 17, 1997

April V. Gil
U.S. Department of Energy
Office of Civilian Radioactive
Waste Management
Yucca Mountain Site Characterization
Office
PO Box 98608
Las Vegas, Nevada 89193-8608

SUBJECT: GENERAL GUIDELINES FOR THE RECOMMENDATION OF SITES FOR
NUCLEAR WASTE REPOSITORIES — NOTICE OF PROPOSED RULEMAKING
(DOCKET NO. RW-RM-96-100)

Dear Ms. Gil:

On December 16, 1996, the U.S. Department of Energy (DOE) published, in the *Federal Register*, for public comment, proposed amendments to its "General Siting Guidelines for the Recommendation of Sites for Nuclear Waste Repositories" found at 10 CFR Part 960 (see 61 *FR* 66158). The U.S. Nuclear Regulatory Commission concurred on the 1984 original version of these guidelines, in accordance with the requirements of the Nuclear Waste Policy Act of 1982 (Public Law 97-425). In its *Federal Register* notice, DOE indicated that it would be submitting the proposed amendments to the Commission for concurrence (61 *FR* 66160).

Inasmuch as DOE has given the staff an opportunity to review the proposed amendments before DOE submits the proposed amendments to the Commission, the staff has some general comments for DOE's consideration (see enclosure). Because DOE plans to submit to the Commission for concurrence its currently proposed amendments, the enclosed comments should not be considered the final NRC position on this matter.

If you have any questions about these comments, please contact Michael P. Lee of my staff. He can be reached at 301-415-6677.

Sincerely,

A handwritten signature in cursive script, reading "Carl J. Paperiello".

Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

Enclosure: NRC Staff Comments on
10 CFR Part 960 Amendments

cc: See Next Page

Distribution List for Letter Dated: _____

cc: R. Milner, OCRWM
C. Johnson, State of Nevada
B. Price, Nevada Legislative Committee
J. Meder, Nevada Legislative Counsel Bureau
W. Barnes, YMPO
C. Einberg, DOE/Wash, DC
M. Murphy, Nye County, NV
M. Baughman, Lincoln County, NV
D. Bechtel, Clark County, NV
D. Weigel, GAO
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B. Mettam, Inyo County, CA
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J. Hoffman, Esmeralda County, NV
J. Regan, Churchill County, NV
L. Bradshaw, Nye County, NV
W. Barnard, NWTRB
R. Holden, NCAI
T. Burton, NIEC
S. Brocoum, YMPO
R. Arnold, Pahrump, NV
N. Stellavato, Nye County, NV
J. Lyznicky, AMA
R. Milner, YMPO
B. Russo, EPA
A. Gil, YMPO
R. Anderson, NEI

**U.S. NUCLEAR REGULATORY COMMISSION
STAFF COMMENTS ON THE
U.S. DEPARTMENT OF ENERGY'S
PROPOSED AMENDMENTS TO ITS "GENERAL SITING
GUIDELINES FOR THE RECOMMENDATION OF
SITES FOR NUCLEAR WASTE REPOSITORIES" —
10 CFR PART 960**

1. The U.S. Department of Energy's (DOE's) draft postclosure system guideline found at Section 960.6-1 states that the "...repository shall perform in accordance with the U.S. Environmental Protection Agency (EPA) standards established specifically for the Yucca Mountain site and the NRC regulations implementing those standards...." (61 *FR* 66164, 66169) At the staff level, we believe that it is not accurate to describe the U.S. Nuclear Regulatory Commission's regulations solely as "...implementing these standards...." NRC's regulations have a broader role than just to implement the EPA standards. They contain the technical requirements and criteria for licensing a geologic repository, as provided for by Section 121(b) of the Nuclear Waste Policy Act of 1982, as amended. However, NRC's regulations must be consistent with the EPA standards for Yucca Mountain.

Action

The staff recommends that the relevant portion of the DOE draft guideline should read "... in accordance with both the EPA standards established specifically for the Yucca Mountain site and NRC's regulations applicable to the Yucca Mountain site"

2. Both the draft postclosure and preclosure system guidelines found at Subpart E (Section 960.6) state that the geologic repository shall be evaluated against the site-specific EPA standards and the NRC regulations (61 *FR* 66169). However, in the supplementary information, it is stated that "...DOE would not reach a determination on the suitability of the Yucca Mountain site under these Guidelines in the absence of the final promulgation of [the EPA] standards...." (61 *FR* 66164) From these statements, it is not clear whether DOE would also defer a site suitability determination on the Yucca Mountain site under its revised Guidelines in the absence of final NRC regulations that have undergone revision so as to be consistent with the EPA standards under the Energy Policy Act of 1992.

Action

The staff recommends that the supplementary information in question be revised to eliminate the lack of clarity.

Enclosure



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 17, 1997

received
#80 4/30/97

MWP

April V. Gil
U.S. Department of Energy
Office of Civilian Radioactive
Waste Management
Yucca Mountain Site Characterization
Office
PO Box 98608
Las Vegas, Nevada 89193-8608

**SUBJECT: GENERAL GUIDELINES FOR THE RECOMMENDATION OF SITES FOR
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(DOCKET NO. RW-RM-96-100)**

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Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

Enclosure: NRC Staff Comments on
10 CFR Part 960 Amendments

cc: See Next Page

**U.S. NUCLEAR REGULATORY COMMISSION
STAFF COMMENTS ON THE
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Action

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Enclosure

81
4/22/97

Bureka Sentinel-Thursdays, April 10, 1997 4

Historical series

The Nevada historical society's "This was Nevada" series

Daniel Bonelli: Colorado river pioneer
by Phillip I. Earl

Born Johan Daniel Bonelli in Switzerland on February 25, 1836, Bonelli was a Colorado river pioneer.

An early convert to Mormonism he left his native land for his missionary work in 1857 and spent the next two years in London.

In 1859 as he sailed for America he met and fell in love with Ann Hight aboard ship. They were married in New York city shortly after landing.

A few weeks later they embarked for St. Louis where they joined a wagon train bound for Salt Lake city.

In Salt Lake city he worked as weaver and a tailor and took

part in church activities before accepting a missionary assignment in the southern section of the Utah territory leading a group of Swiss converts.

Arriving in Santa Clara on Nov. 28, 1861 Bonelli and the colonists set out the first grape arbors in that section of the territory having brought cuttings from France and Spain.

While Bonelli and his wife were living at Santa Clara he happened to meet an Indian who was exhibiting specimens of silver and lead ore from which he had moulded bullets.

When word of this reached church authorities in Salt Lake city Bonelli and two other Mormons were ordered to investigate.

In 1863 they made the first mineral locations in what was later to become the Meadow valley mining district and later the Pioche district in southeast-

ern Nevada.

They knew nothing of mining law however and the claims were taken over by general Patrick Connor and some of his soldiers out of Ft. Douglas, Utah territory.

Bonelli and his growing family - a son and a daughter - moved from Santa Clara after a flood, settling in Beaver valley in 1867 only to be flooded out again on Dec. 24, 1868.

Determined to find a home the family moved to St. Thomas on the Muddy river a few weeks later. They were once again frustrated however when an 1870 survey determined that the communities of the Muddy were within the boundaries of the state of Nevada and had been for four years.

Nevada officials were soon on the scene to collect back taxes and the first of the Mormon families began returning to

Utah in Feb. 1871. All but the Bonelli family.

"I've twice been washed out by floods and to pick up now and leave everything after getting a home started again is too much," he told George Perkins, a writer.

Other Mormons considered him an apostate for remaining but he always maintained that he was a believer in the original tenets of Mormonism and that the church had left him, not the other way around.

He retained his farm at St. Thomas but began to look at the prospects of establishing a river ferry at the junction of the Colorado and the Virgin rivers to serve the mines of Mineral park, Arizona territory, and those of Pioche, Nevada.

He started the ferry business in 1872 and moved his family there. Bonelli's landing as it was known became the com-

munity of Rioville when a post office opened on Nov. 2, 1881.

Bonelli also cleared a hundred acres on the west bank of the Virgin to raise hay, started a cattle herd to raise beef for the mining camps, put in a large vegetable garden and opened a trading post.

In 1882 he discovered a large salt deposit near St. Thomas and began freighting the mineral to mining camps where it was used in the smelting processes. He also developed a market for salt in the Eldorado district downstream on the Colorado, ferrying it down by barge.

He was never able to patent the claims because salt deposits were considered public domain under U.S. mining law until 1902 however.

Thereafter he was engaged in litigation with others seeking to exploit his claims. For example he had mica claims fifteen miles up the Colorado and was involved in suits over his patents.

He also took part in water suits with his neighbors to the north in St. Thomas.

As the first citizen of his remote section of the state, Bonelli took a hand in local education affairs, served on the Nevada state board of agriculture and put together agricultural and mineral exhibits for the world's Columbian exposition in Chicago in 1893 and San Francisco's mid-winter fair in 1894.

Among the exhibits were blocks of his famous translucent salt, sheets of mica and figs, peaches, grapes and almonds he grew himself.

In Nov. 1903 he traveled to Pioche in connection with a salt suit in district court. He returned to St. Thomas on November 16, remaining a day with his son Frank.

He continued on to Rioville the next day but apparently suffered a stroke on the way. He was suffering from dementia when he arrived home and never recovered his sensibilities.

He died at his home on Dec. 20 and was buried behind his house.

Some thirty years later Rioville was due to be covered by the waters of Lake Mead backing up behind Boulder dam so a son, George had his father's body disinterred and moved to a cemetery in Kingman, Arizona where he was reburied on December 21, 1934.

Yucca siting comment period extended

The U.S. department of energy (DOE) has extended until April 16, 1997 the public comment period on its proposal to amend its siting guidelines (10 CFR part 960) that will be used

to determine the suitability of the Yucca mountain, Nevada site for development as a repository for the disposal of spent nuclear fuel and high-level radioactive waste.

The public comment period began December 16, 1996 when the notice of proposed rulemaking was published in the Federal Register.

The comment period was originally scheduled to last 60 days until February 14, 1997.

At the request of interested members of the public, the department extended the comment period by 31 days until March 17, 1997. To accommodate interested parties, the department has provided a second extension of the comment period of an additional 30 days until April 16, 1997 thus providing a combined comment period of 121 days.

A public hearing on the proposed amendments was held January 23 in Las Vegas, Nev. to receive oral comments.

Written comments on the proposed amendments must be received by April 16, 1997 to ensure consideration by the DOE.

The comments received at the public hearing and those submitted during the written comment period will assist the DOE in the rulemaking process.

Comments on the proposal may be submitted by U.S. mail to April V. Gil, U.S. department of energy, office of civilian radioactive waste management, Yucca mountain site characterization office, p.o. box 30307, North Las Vegas, NV 89036-0307 or through elec-

tronic mail to 10CFR960@notes.ymp.gov.

DOE also operates a toll-free information line, (800) 967-3477 for members of the public interested in obtaining copies of the notice of proposed rulemaking or finding out more about the rulemaking process.

Congress directed DOE in fiscal year 1996 to focus on only those activities necessary to assess the performance of a repository at the Yucca mountain site. DOE responded in part by proposing to amend the guidelines as part of the office of civilian radioactive waste management's revised program plan.

The proposed amendments would concentrate the regulatory review on the analysis of overall repository performance at Yucca mountain. This would enhance DOE's ability to provide the public with a more understandable conclusion about the suitability of the Yucca mountain site for the development of a geologic repository.

To provide this focus a new subpart would be added to the existing guidelines that would govern the evaluation of the Yucca mountain site. Other sections of the guidelines would be revised only as needed to make them consistent with the new subpart.

The guidelines applicable to site screening and comparisons would be preserved should they be needed in the future.

"YOUR FREE CATALOG KNOCKED MY SOCKS OFF"

*4-14-97
He Do Got need this! He've suffered enough in Nevada*

We get that sort of comment all the time. People are impressed that our free Consumer Information Catalog lists so many free and low-cost government booklets. There are more than 200 in all, containing a wealth of valuable information.

Our free Catalog will very likely impress you, too. But first you have to get it. Just send your name and address to:

Consumer Information Center
Department KO
Pueblo,
Colorado
81009



A public service of this publication and the Consumer Information Center of the U.S. General Services Administration

Cancer, Lung problems, etc. I've suffered from all these things earlier in Nevada. It equals an American Holocaust!
Connie Hicks

Box 261
Mills, Md 20316



Mrs. M. M. M. M. M.

P.O. Box 30311

J. Lee Jones, Jr. 29136-2307

Attn: Mrs. M. M. M.



DEPT OF ENERGY

4-15-97

Received
82 4/22/97

You are wasting millions!
AND MILLIONS OF DOLLARS!

COMMON SENSE ALONE

Tells you YUCCA MTX. IS
NOT SAFE FOR YOUR DEADLY
WASTE!

GOD GAVE US COMMON
SENSE. USE IT.

YOU KNOW, IT IS VULNERABLE
TO EARTHQUAKES! THE
GROUND WATER IS ALREADY
~~SAFE~~ LETHAL!

ALSO, TRANSPORTING ACROSS THE
HIGHWAYS! — WILL NEVER BE
SAFE.

2.

STOP THINKING OF PROFIT
FOR A FEW - AND THINK
OF THE MILLIONS ^{OF PEOPLE} YOU WILL
HARM.

SINCE 1979 I HAVE READ
THE REPORTS, ETC. ETC. ALL BAD.
I FELT THE EARTHQUAKE TOO.

YOU CANNOT CONTROL THE
EARTHQUAKES THERE!

GOD GAVE YOU COMMON
SENSE - AGAIN, I SAY,
USE IT. STOP DESTROYING!

KEEP WASTE WHERE IT IS.
THEY WANTED WHAT MADE
IT - SO YOU SHOULD HAVE
PLANNED BEFORE CREATING

3.

this deadly MONSTER!

It is simple. Yucca MTX
could be used FOR good -
NOT your evil.

Do what is Right.

I could send you many
ARTICLES, etc., but I do
NOT have Time Now.

M. MAYERS

P.S. Everyone I know -
many people - with families,
Feel this way also!

God help you!

May 16, 1979

copy

The Honorable Robert List
Governor's Office
State Capitol Complex
Carson City, Nevada 89710

Dear Governor List:

Please continue your firm position on controlling nuclear waste in Nevada.

Please take the time to read the enclosed article by Jim Bishop.

I have wanted to write to you for the past three months but being a busy working mother does not leave much time for letter writing. ~~_____~~

~~_____~~ of your
biggest fans!

I also read where you have assigned a committee to study the effects of radioactivity on Nevadans. I have had a "feeling" for a long time that perhaps my father may have been affected by the fallout through the milk. He worked at Anderson Dairy, Las Vegas, directly with the milk from 1955 to 1965. In the fall of 1964 at the age of 58 he was diagnosed as having leukemia and died in February 1965. No words will say how sad it was. Yesterday I read the enclosed newspaper article about "contaminated milk" and decided definitely to write this letter.

I strongly believe all nuclear waste and nuclear power should be kept out of Nevada - period... We have been exposed enough. All the money in the world is not worth the danger it brings to our environment and our children and their children. All my relatives and friends feel this way also. You have our support and prayers in your work. Thank you.

Respectfully yours,

Marilyn Mayers

Marilyn Mayers
4775 South Topaz, Apt. 112
Las Vegas, Nevada 89121

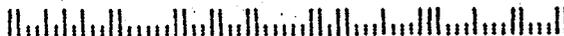
encl/2

TO DOE Do you have the right to
place this deadly curse
on us and our children?



Docket No.
RW-RM-96-100

April Gil, U.S. Dept. of Energy
Office of Civilian Radioactive Waste
Yucca MTN Site Office ^{Mgmt}
P.O. Box 30307
Las Vegas



Comment number 83.

The attached are representative samples of similar postcards received by the Department of Energy. As of 5/14/97 the Department has received 507.

Dear Ms. Gil:

Section 112(a) of the Nuclear Waste Policy Act -- in force today -- mandates specific guidelines ... that "specify detailed geologic considerations that shall be the primary criteria for the selection of sites in various geologic media."

DOE should preserve the specific technical parameters that will qualify or disqualify Yucca Mountain, and these should be the same as those that would be applied to any site, as current guidelines state. There can be no compromise, or changes, when it comes to isolation of nuclear waste from the environment. The Yucca Mountain siting criteria must be, without question, the most stringent.

DOE should not set the bad precedent of drastically changing the rules on a project far into the program. By doing so, DOE undercuts any remaining scientific credibility in a decision to develop Yucca Mountain as a waste repository. There is a loss not only of scientific credibility, but public credibility as well. Credibility which has already suffered dearly under this program.

For these reasons, I request that DOE withdraw its proposed rule, and to apply the existing guidelines to the Yucca Mountain site. Nevada and the nation demand accountability on this vitally important project. Anything less is unacceptable.

Signature: _____

Jean G. Wells

Name: _____

Jean G. Wells

Address: _____

78 Sunnyside Dr. Reno, NV 89503

received
83 4/24/97

MWP

Dear Ms. Gil:

4-16-97

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Signature: _____

Jo Anne Garrett

Name: _____

Jo Anne Garrett

Address: _____

*PO Box 130
Baker NV 89311-0130*

received
83 4/30/97

MWP

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Signature: _____
Name: _____
Address: _____
Ms. Robin Kosseff
P.O. Box 9202
Reno, NV 89507



received
#83 5/6/97
mmp

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Signature: Jean Butler
Name: Jean Butler
Address: 2996 Cloverdale Dr., Sparks, NV 89434

received
83 5/11/97
mmp

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Signature: Alain Richard

Name: Alain RICHARD

Address: 1420 W. Bartlett Ave. L.V. 89106

received
#83 4/22/97
MWP

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Signature: Zanna L. Reb

Name: ZANNA L. REB

Address: 5805 W. Harmon St. Las Vegas NV. 89103

received
#83 5/8/97
mmP



UNITED STATES
NUCLEAR WASTE TECHNICAL REVIEW BOARD
1100 Wilson Boulevard, Suite 910
Arlington, VA 22209

April 15, 1997



Ms. April V. Gil
U.S. Department of Energy
Office of Civilian Radioactive
Waste Management
Yucca Mountain Site Characterization
Office
PO Box 98608
Las Vegas, NV 89193-8608

Dear Ms. Gil:

The Nuclear Waste Technical Review Board appreciates the opportunity to comment on the proposed revisions to the Department of Energy's (DOE) General Guidelines for the Recommendation of Sites for Nuclear Waste Repositories (10 CFR 960).

The Board submits these comments as part of its responsibilities under the Nuclear Waste Policy Amendments Act to evaluate the scientific and technical validity of activities carried out by the Secretary of Energy and the DOE Office of Civilian Radioactive Waste Management. In doing so, it takes no position whatsoever on the legal issues that might be raised in regard to these revisions. Nor does it address the question of whether these revisions are consistent with the Nuclear Regulatory Commission's (NRC) licensing regulations, 10 CFR 60.

Background

If adopted, these guidelines will be used to evaluate the suitability of a specific repository design for the Yucca Mountain site. A demonstration that the repository system (including both natural and engineered features) complies with the guidelines will be the critical technical input to the President's decision to seek a license from the NRC to construct a repository. Thus, the Board recognizes that choices made now about the substance and the form of the guidelines are significant.

The current site-suitability guidelines advance a lengthy list of site characteristics and require that each be consistent with an overall system performance objective. In the case of some of the characteristics, a threshold test of acceptability also must be passed. Furthermore, the current guidelines appear to limit the degree to which engineered barriers can be relied upon to meet an overall system performance objective.

Under the revisions proposed by the DOE, the site-suitability determination would no longer depend on factors such as environmental quality, socioeconomics, and transportation. Nor would it require an evaluation of repository construction, operation, and closure. Instead, site suitability would be determined only by whether the *repository system* (natural and engineered barriers) can meet a post-closure performance standard that will be specified by the Environmental Protection Agency.

Although the current guidelines, in principle, could be used to determine the suitability of a specific site, the Board believes that there may be some practical limitations in applying them. Furthermore, the current guidelines obscure – although they are not inconsistent with – the fundamental importance of understanding how each characteristic of a repository affects its overall performance as a system. Linking suitability directly and unambiguously to system performance, the proposed revised guidelines seem to be a sounder approach. Indeed, the Board has emphasized overall performance in defining suitability for its own purposes as “a high probability that the site, along with appropriate engineered barriers, can provide long-term waste isolation.” Thus, the Board believes that the proposed revisions to 10 CFR 960 represent a step in the right direction.

The DOE proposes to use the technique of performance assessment to determine whether the Yucca Mountain site is suitable. While that technique can be used to derive important insights, its application at Yucca Mountain has not fully matured. To date, efforts by the DOE to assess repository performance show clearly how complex the analysis of a repository system can be. Process models must be developed, and their key parameters have to be evaluated, either experimentally or through the use of informal or formal expert judgment. These individual models must then be combined into a single, integrated methodology to produce an estimate of the repository’s performance. For each of the components of the analysis, methodological and empirical assumptions have to be made. Thus, uncertainties will unavoidably accumulate. They will be large, and they will become even larger as the time horizon for the performance projections reaches farther into the future.

Specific comments

The complaint that the proposed revisions to the guidelines “change the rules in the middle of the game” reflects, at least in part, fears that performance assessment may be manipulated to support any conclusion desired. With so much riding on a single set of calculations, it is difficult to dismiss those fears as illegitimate or unwarranted. For that reason, the Board believes that the DOE must modify its proposed revisions to 10 CFR 960 to strengthen confidence in the technical validity of the performance assessment in the following ways.

1. *The DOE should show in its performance assessment that the repository system is designed in a manner that preserves the principle of defense-in-depth using multiple barriers.* The current guidelines use “sub-system performance criteria,” such as ground-water travel time and waste package release rates, in an attempt to ensure that multiple barriers contribute to waste isolation and containment in the repository system. Although the Board recognizes that subsystem criteria could be arbitrary and unworkable, it strongly believes that the principle of defense-in-depth using multiple barriers must be preserved. The Board would object if the prominence given

performance assessment in the proposed revised guidelines were to have the effect of diluting the DOE's commitment to that principle. The Board does not, however, wish to prescribe a particular mix of barriers that the DOE must adopt. Thus, in the Board's view, a site may be suitable even if the repository system placed there has to rely on engineered barriers for waste containment and isolation to a greater degree than was envisioned when the current guidelines were published.

Consequently, the Board believes that the proposed revisions should be modified to incorporate language requiring that performance assessment be used to show that defense-in-depth plays an important role in the performance of a repository system. In particular, the DOE should:

- ♦ Clearly articulate and provide empirical support for the hypotheses that underlie an explicit strategy for using defense-in-depth to secure waste containment and isolation.
- ♦ Show that the repository design contains significant redundancy so that more than one independent barrier contributes to the capability of the repository system to contain and isolate waste over the period of compliance.
- ♦ Assess the relative roles played by natural and engineered barriers, as well as analyzing their potential interactions.

2. *The DOE should add a requirement that performance assessment not only show that the repository system complies with a standard, but that it does so robustly.* A conclusion will more likely be accepted as robust if:

- ♦ Uncertainties are fully and accurately addressed.
- ♦ Sensitivity studies are carried out to show the effects of higher or lower values of variables.
- ♦ Compliance is shown with a margin of safety.

A robust conclusion about the performance of a repository system should be better able to withstand challenges brought about by new knowledge and changing assumptions.

3. *The DOE should specify the level of confidence that must be reached in its performance calculations before it is prepared to make a positive site-suitability determination.* Underlying the DOE's proposed revisions to the guidelines appears to be the implicit presumption that clear and obvious conclusions can be drawn from the performance assessment. As noted above, the Board believes that a performance assessment may, in fact, produce values that have substantial uncertainty bands around them, especially if the assessment is carried out in a manner consistent with the recommendations included in this letter. Therefore it is essential that the DOE specify in advance the level of confidence needed to make a positive site-suitability determination. That level should be expressed quantitatively whenever possible, although only a qualitative definition may be feasible in some areas.

This acceptable level of uncertainty is a policy judgment that is clearly the DOE's to make. The Board believes that the credibility of the process would be increased if interested parties were involved in making that call. But the DOE should provide sufficient explanation for whatever level it decides upon so that those affected have a clear understanding from the start about how the DOE will use the performance assessment's conclusions to make decisions.

4. The DOE should add a requirement that the performance assessment be carried out in a manner that is highly transparent to the technical community, regulators, and interested members of the general public. By transparent, the Board means the ease of understanding (1) the process used to carry out the performance assessment, (2) the assumptions that drive the assessment's conclusions, and (3) the rigor of the analyses that lead to the assessment's conclusions. A performance assessment will likely be more transparent if:

- ♦ Assumptions and methodologies used in the analyses are clearly and explicitly identified, the bases for them are clearly explained, and their impact on the assessment's conclusions are clearly presented.
- ♦ Key parameters and their distributions can be traced back to specific experiments and investigations or to judgments, either formal or informal.
- ♦ It has undergone independent and comprehensive outside review.

Among the mechanisms the DOE might use to increase transparency for the technical and regulatory communities are well-documented expert elicitations and independent peer reviews. To increase transparency for the interested and affected members of the public, the DOE should consider using processes that are modeled on the lines suggested in the recent report from the National Academy of Sciences, *Understanding Risk*.

5. The DOE should formally connect its site-suitability determination to a larger and public process for making the decision whether to recommend to the President that Yucca Mountain be developed as a repository. Without such a process, it will be difficult to develop a broad national consensus that Yucca Mountain is "safe enough." While its postclosure performance is a central consideration in the evaluation of a repository system, additional considerations also need to be assessed and appropriately weighed. Those considerations include the cost of building the repository in the host formation, the environmental consequences of constructing a repository, the socioeconomic effects on surrounding communities, and the transportation risks involved in shipping waste to the site. It is essential that whatever process is adopted by the DOE does not foreclose at the start a decision *not to recommend* the development of the Yucca Mountain site based upon those site-specific considerations.

Again, the Nuclear Waste Technical Review Board appreciates this opportunity to comment on the proposed revisions to 10 CFR 960.

Sincerely,



Jared L. Cohon
Chairman



UNITED STATES
NUCLEAR WASTE TECHNICAL REVIEW BOARD
1100 Wilson Boulevard, Suite 910
Arlington, VA 22209



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Ms. April V. Gil
U.S. Department of Energy
Yucca Mountain Site Characterization Office
PO Box 98608
Las Vegas, NV 89193-8608

89193-8608



CITIZEN ALERT

NATIVE AMERICAN PROGRAM

Reno Office
P.O. Box 5339
Reno, NV 89513
(702) 827-5511 voice
(702) 827-4299 fax

Duckwater Office
P.O. Box 140064
Duckwater, NV 89314
(702) 863-0258
voice & fax

CANAP ADVISORY BOARD

KEVIN JONES
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Mexican Indian

STAFF

VIRGINIA SANCHEZ
Director

April 15, 1997

April V. Gil
U.S. Department of Energy
OCRWM
Yucca Mountain Site Characterization Office
P.O. Box 98608
Las Vegas, Nevada 89193-8608

received
85 4/23/97

Dear Ms. Gil:

On behalf of the board of Citizen Alert Native American Program (CANAP), I submit the following comments regarding the Nuclear Waste Policy Act guidelines.

But first let me introduce CANAP. CANAP works with Native communities in Nevada and the Great Basin on issues affecting their environment. CANAP recognizes that Native Peoples' protection of the environment cannot be separated from the Native nations' right to their own culture and jurisdiction over their lands and resources. Healthy and clean land and resources are a critical part of Indigenous Peoples' ability to continue as a unique and distinct people.

On March 21-23, 1997, Indigenous Peoples throughout the Great Basin came together on the west side of Yucca Mountain, located within Western Shoshone homeland, to learn about the efforts of the nuclear industry to transport and store deadly radioactive waste on and within our Mother Earth; and Department of Energy's proposition to to revise the current siting guidelines for Yucca Mountain.

Ceremonies of acknowledgement and thanksgiving were offered for the protection and healing of all parts of creation; the lands, water, air and creatures, including human life, that have been desecrated because of the Nevada Nuclear Test Site military activities. This gathering was an event endorsed and sponsored by the Western Shoshone National Council and supported by CANAP. The lands of the Nevada Nuclear Test Site are Western Shoshone lands, as outlined in the 1863 Treaty of Ruby Valley and must be protected from future destruction.

I give you this aforementioned information as context in which these comments are provided. The Nuclear Waste Policy Act mandates specific guidelines which are currently in force today. Section 112 (a) of the Nuclear Waste Policy Act mandates specific guidelines. The guidelines in part "specify detailed geologic considerations that shall be the primary criteria for the selection of sites in various geologic media."

Yucca Mt. Siting Guidelines

April 15, 1997

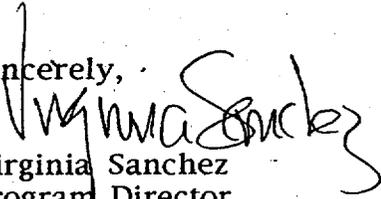
Page 2

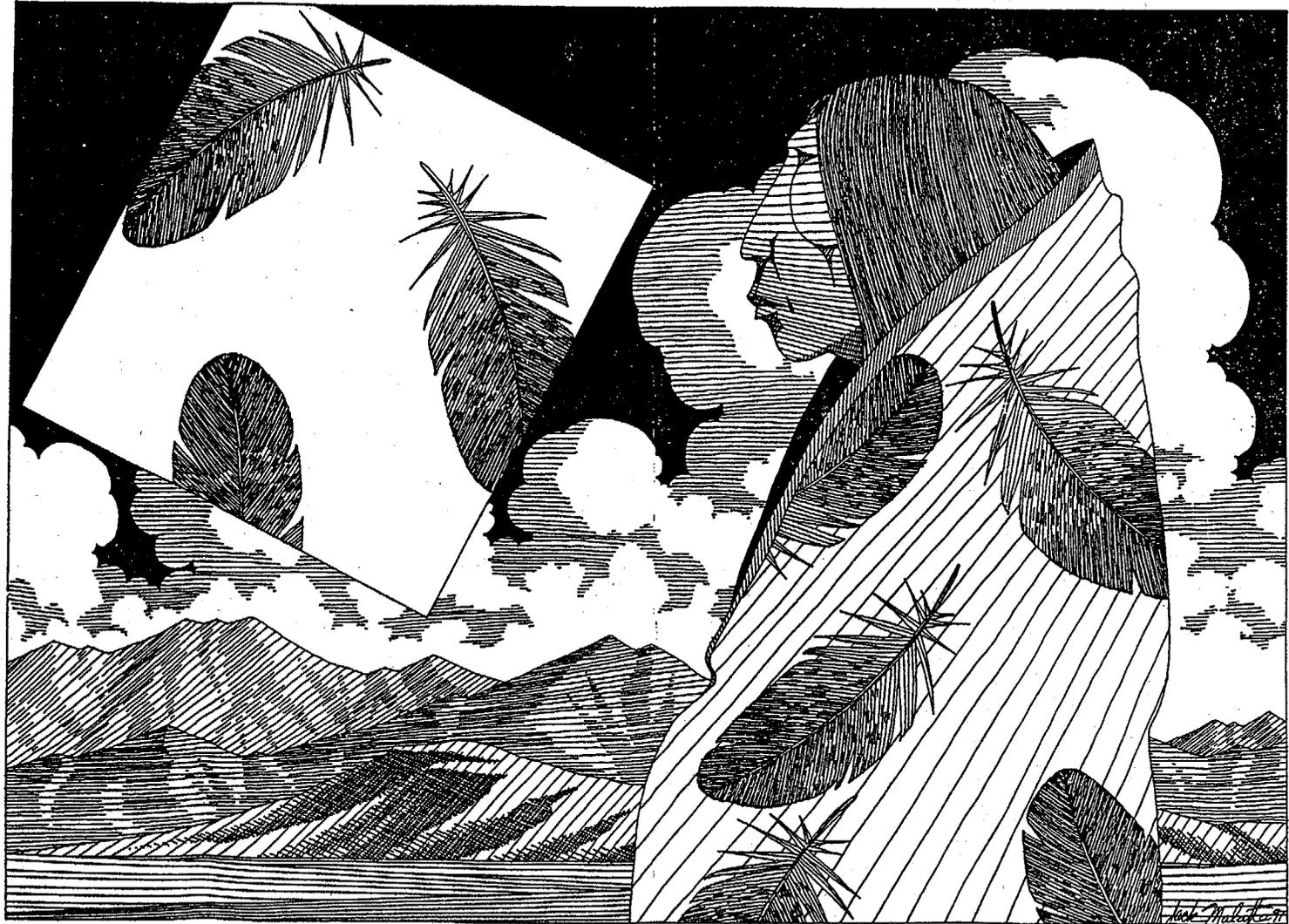
Department of Energy (DOE) should preserve the specific technical parameters that will qualify or disqualify Yucca Mountain, and these should be the same as those that would be applied to any site, as the current guidelines state. There can be no compromise, or changes, when it comes to isolation of nuclear waste from the environment. The Yucca Mountain siting criteria must be, without question, the most stringent.

DOE should not set the bad precedent of drastically changing the rules on a project far into the program. By doing so, DOE undercuts any remaining scientific credibility, but public credibility as well. Credibility which has already suffered dearly under this program.

For these reasons, CANAP requests that DOE withdraw its proposed rule, and to apply the existing guidelines to the Yucca Mountain site. The Indigenous Peoples of the Great Basin, Nevada, the nation demand accountability on this vitally important project. Anything less is unacceptable.

Sincerely,


Virginia Sanchez
Program Director



NUCLEAR FREE NEWE SOGOBIA GATHERING

NUCLEAR FREE NEWE SOGOBIA GATHERING

MARCH 21, 22, & 23, 1997

GATHERING SCHEDULE

Friday March 21, 1997

- >>-----> Sunrise Ceremony
- >>-----> All Day Arrivals
- >>-----> 6:00 pm Dinner
- >>-----> 7:00 pm Sweats
- >>-----> 8:00 pm Campfire

Saturday March 22, 1997

- >>-----> Sunrise Ceremony
- >>-----> 7:00 am Breakfast
- >>-----> 8:00 am Blessing/Welcoming: Corbin Harney, Spiritual Leader; Chief Raymond Yowell, WSNC; Dedee Sanchez, Director CANAP.
- >>-----> 9:00 am Panel 1: Brian Wallace, NIEC; Carol Yeatman, NLS; Steve Frishman, Tech./Policy Analyst NWPO; Tom Goldtooth, IEN.
- >>-----> 10:30 am Break
- >>-----> 10:45 am Panel 2: Nilak Butler, NFF/ILG; Carletta Tilousi, SNEEJ; Tom Burton, NIEC/NINWPC.
- >>-----> 12:30 pm Lunch
- >>-----> 1:30 pm Workshop: Strategy/Discussion
- >>-----> 3:30 pm Break
- >>-----> 3:45 pm Workshop: Strategy/Discussion
- >>-----> 6:00 pm Dinner
- >>-----> 7:00 pm Sweats
- >>-----> 8:00 pm Campfire/Guardians of the Grand Canyon

Sunday March 23, 1997

- >>-----> Sunrise Ceremony
- >>-----> 7:00 am Breakfast
- >>-----> 8:00 am Workshop: Strategy/Discussion
- >>-----> 10:00 am Break
- >>-----> 10:45 am Workshop: Strategy/Discussion
- >>-----> 12:30 pm Lunch
- >>-----> Check-out/Good-bye

The Western Shoshone National Council and Citizen Alert Native American Program are hosting a Nuclear Free Newe Sogobia Gathering March 21, 22, and 23, 1997. Your tribe and community are invited to attend the gathering with other tribes from throughout the Great Basin along with our special invited tribal leaders and Native American activists.

For thousands of years Indigenous Peoples have lived within the Great Basin in peace and harmony. Since 1951, the nuclear military complex has contaminated the land with nuclear testing. Small quantities of low-level radioactive waste are being transported across the land. The waste comes from commercial reactors that are deteriorating after operation for the past forty years. Since the beginning of the nuclear age the waste has been stored on site at the nuclear reactors. Today, the storage space is running out. The commercial operators of the reactors need to store the waste somewhere if they want to make more money. Putting the waste in our Mother Earth at Yucca Mountain and placing our people and environment at severe risk is unacceptable. To this we say, "NOT IN OUR MOTHER EARTH!"

The Nuclear Free Newe Sogobia Gathering is an opportunity for Native American peoples from throughout the Great Basin to come to Yucca Mountain and see for themselves what is happening. To see Yucca Mountain is to understand how wrong it would be to dump nuclear waste here. We also want to educate the people about why the creation of nuclear waste is wrong and why low-level nuclear waste is the same problem with a different name. We will have several workshops with dynamic speakers who will inform us and educate us about the problems, risks and strategies we can use to defeat the dump. Every tribe has been

approached with offers of money and so called "benefits" if they would host a permanent nuclear waste dump or a temporary site on their reservation; which could become a permanent if no permanent dump site is agreed upon.

Transportation of high level nuclear waste by train or truck would cross many treaty territories and reservations. In the Great Basin nuclear waste transportation routes are being considered through or near Native American communities on the following rail and/or highway routes:

- Moapa Paiute Reservation: I-15 and UPRR
- Las Vegas Paiute Colony: I-15, US-95; UPRR, Dixie Rail Siding Option (to be constructed)
- Fort Mohave Reservation: I-40
- Yomba Shoshone Tribe: Carlin Rail Option (to be constructed)
- Duckwater Shoshone Tribe: Highway 6; Carlin Rail Option (to be constructed)
- Ely Shoshone Colony: Highway 93
- Pyramid Lake Paiute Reservation: I-80; UPRR
- Reno Sparks Indian Colony: I-80; UPRR
- Walker River Paiute Reservation: UPRR; Mina Option (to be constructed)
- Western Shoshone Treaty Territory: I-80; I-15; US-6; US-93; US-95; SR-160; SR-375; UPRR (from California, Utah and Arizona)
- Yerington Paiute Colony: UPRR
- Fallon Shoshone Paiute Reservation: UPRR
- Lovelock Colony: I-80; UPRR
- Winnemucca Colony: I-80; UPRR
- Battle Mountain Colony: I-80; UPRR
- Elko Colony: I-80; UPRR
- Wells Colony: I-80; UPRR
- Cedar City Paiute Tribe: I-15; UPRR

Concerns for these areas include land rights issues; destruction of cultural sites, religious and burial sites; sensitive environment; land use economic conflicts. We cannot afford to rest. The nuclear waste problem must be dealt with.

Our campsite has been blessed and is located at the western base of Yucca Mountain on the edge of Crater Flat (see map). It is only 8 miles off of the paved highway with a good road right to the campsite. Vehicles of any size and style can travel to the campsite without problem. March condition can be cool or warm. Warm clothing and hats are advised. Be prepared for camping outdoors. You should bring tents, sleeping bags, soft mats, folding chairs and water for personal use.

Directions are as follows: From Las Vegas: North on US-95 for 100 miles. On the north side of US-95 at the southeast base of Bare Mountain turn right onto a graded dirt road (marked with signs) follow the road 1 mile over Steves Pass then 3 miles to fork in the road. Take right fork (look for signs) across Crater Flat between volcanoes 3 miles then veer to the right then drive for 1 more mile to campsite (Welcome Home).

From all points north: South on US-95 to Beatty. South on US-95 for 15 miles to southern base of Bare Mountain. Turn left on graded dirt Road (look for signs). From there follow directions above.

Mileage stipends are available for those in need traveling in groups of four or more. Call Ian Zabarte at 702-796-5662 if you need travel assistance. No alcohol or drugs allowed.

FOR MORE INFORMATION CALL:

Ian D. Zabarte @ (702) 796-5662

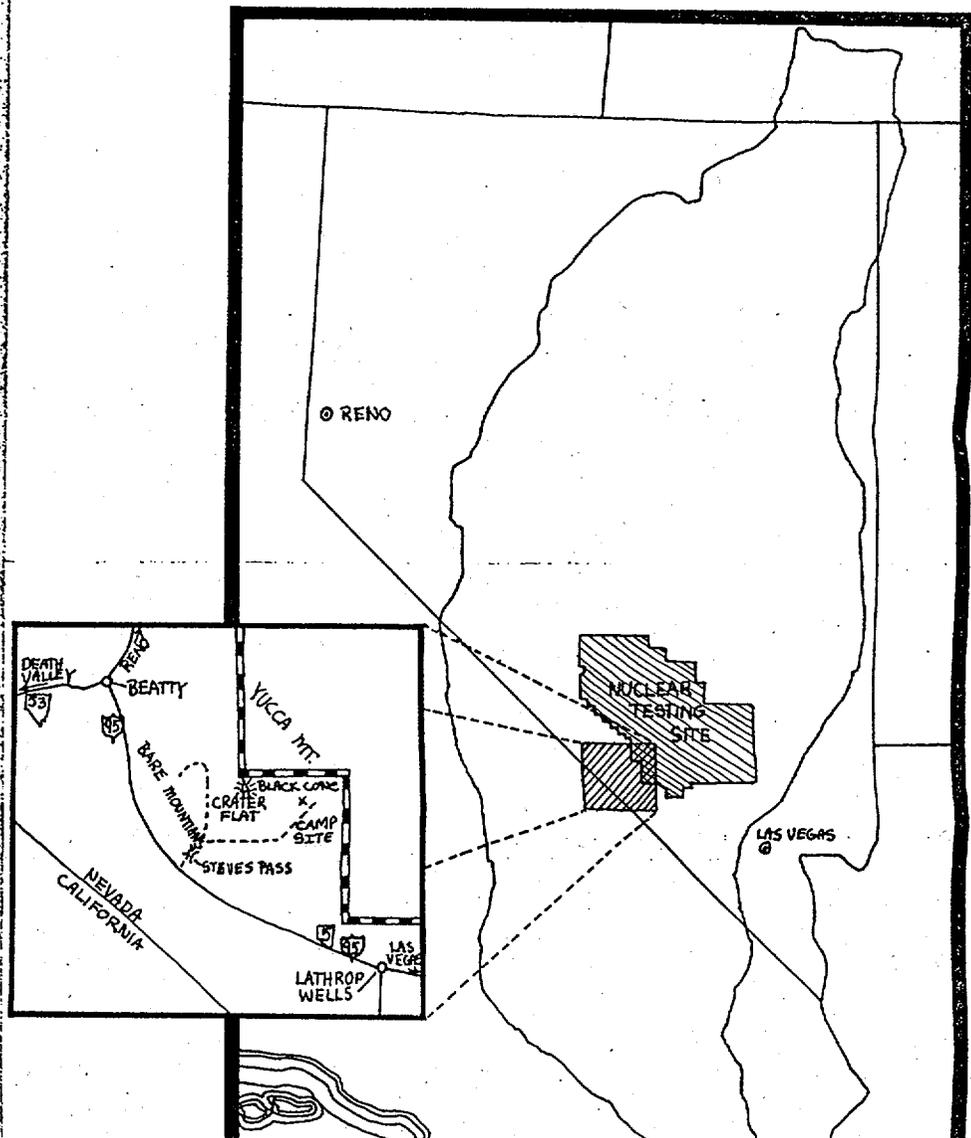
"THE WESTERN SHOSHONE ARE THE RIGHTFUL STEWARDS OF THIS LAND. WITH MORE THAN 900 BOMBS EXPLODED WITHIN AND ON OUR HOMELANDS, WE ARE THE MOST BOMBED NATION ON EARTH. AS A RESULT OF THE NUCLEAR BOMBING AND RADIOACTIVE FALLOUT CONTAMINATION, OUR PEOPLE, THE SOUTHERN PAIUTE TRIBE AND OTHER DOWNWIND COMMUNITIES SUFFER FROM CANCERS, THYROID DISEASE, AND BIRTH DEFECTS. FURTHER DESECRATION OF OUR NEWE SOGOBIA MUST BE STOPPED! WE ADAMANTLY OPPOSE THE SITING OF RADIOACTIVE WASTE WITHIN OUR HOMELANDS; SUCH ACTIONS VIOLATE NEWE SOGOBIA AND THE 1863 TREATY OF 'RUBY VALLEY!'"

CHIEF RAYMOND YOWELL, WESTERN SHOSHONE NATIONAL COUNCIL

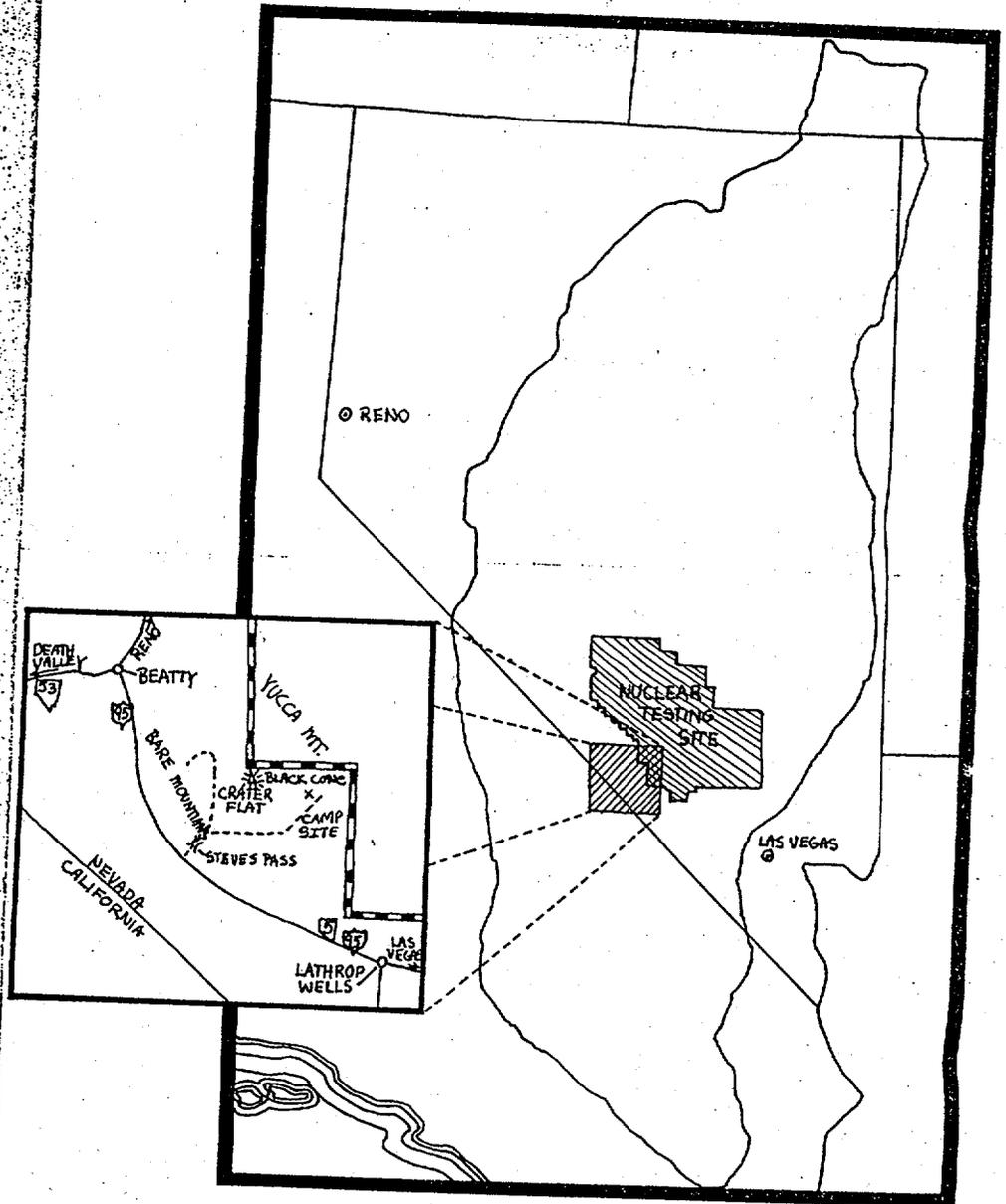
For information contact: Ian Zabarte, Gathering Organizer (702) 796-5662 OR Virginia Sanchez, CANAP Director At: (702) 827-5511 (Reno) and (702) 863-0258 (Duckwater)

Funding for this event is made possible by
Seventh Generation Fund-Honor The Earth Campaign.

Radiation Concerns: Discussion about radiation exposure at the Nevada Test Site is ongoing, but is generally agreed that unless there has been a recent (within 72 hours) detonation of an underground nuclear weapon, the danger to your health is minute. The United States has maintained a moratorium on underground nuclear testing since October of 1992. We know that background radiation throughout the world is elevated from what it was before nuclear technology. Background radiation at the Nevada Test Site and Las Vegas are often the same even after a nuclear weapons test. We believe that there is a far greater risk to our health if we do not get educated about the nuclear waste problem.



we do not get educated about the nuclear waste problem.



We Will Provide:

- > Food (for a meat and potatoes crowd) free to all gathering participants for the entire event. Water tank will be available or refilling you own bottle or p. Drink plenty of Cactus Springs water (1 gallon a day).
- > Portable Toilets will be provided.
- > Basic First Aid is provided.
- > Check-in Table should be your first stop for information and to inform us of your arrival.

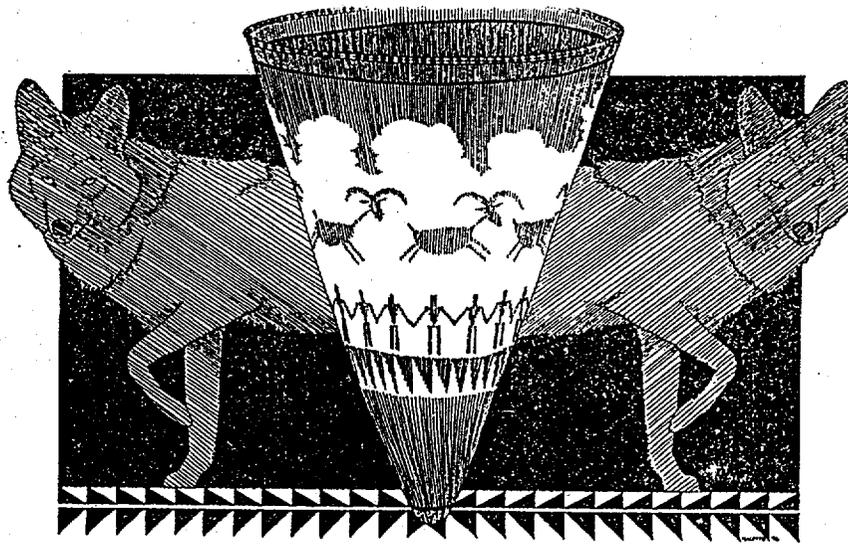
Other Information:

- > Hotels are available in Beatty (30 miles away) call: Burro Inn (\$37.00 Daily Rate) Tel: 702-553-2225 or Phoenix Inn (\$37.00 Daily Rate) Tel: 702-553-225

**FUNDING FOR THIS EVENT
IS MADE POSSIBLE BY
THE SEVENTH GENERATION FUND
HONOR THE EARTH CAMPAIGN**

SPECIAL THANKS TO:

**THE WESTERN SHOSHONE NATIONAL COUNCIL
CORPORATION OF NEWE SOGOBIA
SHUNDAHAI NETWORK
CITIZEN ALERT
ACTION FOR NUCLEAR ABOLITION
HEALING GLOBAL WOUNDS**



CALENDAR OF *OTHER* EVENTS

- March 14-16, 1997 Non-Governmental Organizations Conference on Nuclear Free Zones, Burg Schlaining.
- March 23-30, 1997 Nevada Desert Experience Lenten Desert Experience Las Vegas - Nevada Test Site Walk. Info: (702) 646-4814 E-mail: nde@igc.apc.org
- March 26-27, 1997 Council of Women to End the Nuclear Age. Info: Susan Lee (512) 447-6222 E-mail: nukemuse@igc.org
- March 27-31, 1997 Healing Global Wounds - Nevada Test Site Peace Camp. Info. Jennifer Viereck (408) 338-0147 E-mail: hgw@scrznet.com
- March 31-April 05, 1997 Action for Nuclear Abolition Non-violent Action Camp. Info (702) 647-3095 E mail: shundahai@intermind.net Http://www.macronet.org/macronet/shundahai/shutdown.html
- April 01, 1997 Nuclear Fools Day Parade Las Vegas Strip to DOE/HQ.
- April 07-17, 1997 Non Proliferation Treaty Preparatory Conference, United Nations N.Y.C.
- April 27-30, 1997 Military Production Network 1997 D.C. Days, Washington, D.C. Info. MPN (202) 833-4668
- May 19-27, 1997 Traditional & Endangered Peoples Conference, Rotterdam Holland.

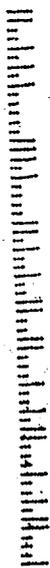
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LAS VEGAS, NEVADA 89109

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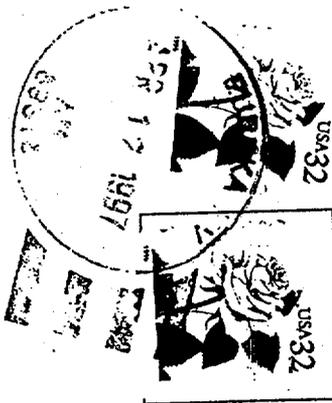
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BOX 5339 • RENO • NEVADA 89513

89193/8608 08



APRIL V. GIL
U.S. DEPT. OF ENERGY
OCEAN
YUCCA MOUNTAIN SITE CHARACTERIZATION
OFFICE
P.O. BOX 98608
LAS VEGAS NV 89193-8608



Dear ~~Ms. Gil~~, April V. Gil

I support tougher air quality standards and cleaner air in Nevada.

Recent reports show that ozone smog is linked with increased hospital admissions for asthma and other respiratory problems. In addition, over 60,000 premature deaths may occur each year due to particle soot. Nevada has long suffered from unacceptable levels of particulates.

Major sources of these types of air pollution include utilities and the auto, oil, chemical and mining industries. These big polluters have launched a multi-million dollar scare campaign to block tougher health standards and otherwise attempt to roll back the Clean Air Act.

While EPA's proposals are a step in the right direction, they do not go far enough -- in some instances actually weakening public health protection. For example, we should not roll back existing health protection on standards for coarse particles (PM-10). I urge you to ignore the polluters' dirty air campaign and support a final rule that is consistent with strengthening public health protection, which is threatened by dirty air here in our beautiful State of Nevada.

Ms -
Signature: Lucille N. Estrella ^{2nd} of Joanne Estrella
Name: PO BOX 62
Address: Eureka, Nevada -89316

Dear Ms. Gil:

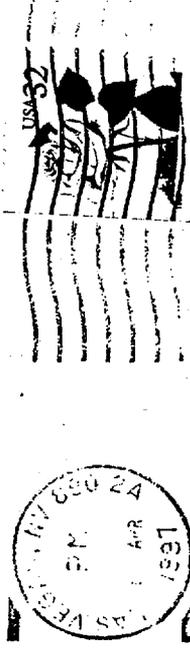
Section 112(a) of the Nuclear Waste Policy Act -- in force today -- mandates specific guidelines that specify detailed geologic considerations that shall be the primary criteria for the selection of sites in various geologic media.

DOE should preserve the specific technical parameters that will qualify or disqualify Yucca Mountain, and these should be the same as those that would be applied to any site, as current guidelines state. There can be no compromise, or changes, when it comes to isolation of nuclear waste from the environment. The Yucca Mountain siting criteria must be, without question, the most stringent.

DOE should not set the bad precedent of drastically changing the rules on a project far into the program. By doing so, DOE undercuts any remaining scientific credibility in a decision to develop Yucca Mountain as a waste repository. There is a loss not only of scientific credibility, but public credibility as well. Credibility which has already suffered dearly under this program.

For these reasons, I request that DOE withdraw its proposed rule, and to apply the existing guidelines to the Yucca Mountain site. Nevada and the nation demand accountability on this vitally important project. Anything less is unacceptable.

Signature: Maria M. Donoso
Name: 7375 E. Tompkins Ave. #114
Address: P.O., Nevada 89121



received
86 4/23/97

April V. Lil
US Dept. of Energy
OLRW/M
Yucca Mountain Site Characterization Office
P.O. Box 98608
Las Vegas, NV 89193-8608



YOU CAN NOT CHANGE THE RULES
IN THE MIDDLE OF THE GAME
WHEN YOU REALIZE YOU CAN'T WIN.
- THIS IS TOO IMPORTANT -
BE RESPONSIBLE AND HONEST.

received

76/42/4 L8

DOE NEEDS TO STICK TO THE
ORIGINAL RULES ON YUCCA MT.
AS AN EXCEPTABLE SITE, TO DO
WHAT MUST BE DEMANDED AS A
NUKE DUMP.

4-14-97
Eureka, Nev. 89316

Gerald J. Gill
Dept of Energy



North Las Vegas, Nev. 89036

Dear Sirs,

Here my comments of (DOE)

Do not make our Sage Brush Country Nevada
a Waste Dump,

People here in Eureka, Nev. used to die of old age.
Since Yucca mtn. my neighbors my family has
died of cancer and emphysema - What future
has the young children have? I am a
native of Nevada.

Just stop it, wake up. Stop that poison
where it was made or come from. Thank you
are you listening think of your ^{own} health -

I old timer and hope to die 4 old
Lucille M. Estella age

P.O. Box - 62

(4 pray) Eureka, Nevada 89316

P.S. Our President Bill Clinton please stop it or them -
(Eureka)

received
89 5/12/97

May 06, 1997

DEPARTMENT OF ENERGY,
OFFICE OF CIVILIAN RADIOACTIVE WASTE
P.O. BOX 30307, NORTH LAS VEGAS, NV 89036-0307

DEAR, D.O.E.,

I am writing to comment upon my own thoughts about the storage of radioactive waste in YUCCA MOUNTIAN. I oppose any such thing first of all but, I am sure the department thinks it's reasons are very legitment. So I'll put it this way, I ask this question, would the department insure the millions of lives that live here in Las Vegas and the millions that will congregate here in the ten-thousand years to come, if the project fails? The answer can only be no because the decision makers will be lucky to live another fifty years, and the ones to pay for it will be the tax payers.

I will admit I am ignorant to the governments present technology, but that is only because the government wishes to keep it to themselves. That is only proper, because it keeps the U.S. ahead of the rest, and I support my country. I am the future generation, and I am looking towards my future, and for the children to come, after I have been long been turned to dust. My opinion is, that nothing is ever set in stone and if it is, with time it will no longer be. This project is seen in my eyes, as a risk to human lives.

For instance the water regulations in the city of Las Vegas are very strict, meaning that if by chance there was a radioactive leak, no matter how small, there is a chance it could affect our water supply. Let's say, after one-hundred years had past, and that for the last twenty years that there was a slow leak into the earth's soil. Tell me how would that effect the people in the state of Nevada. How about the people in Las Vegas after a hundred years of growth, that would put them even closer to the site. I am sure you have very legitament answers for my questions but, these are only a few of many that criss cross the patterns in my mind.

The geographly changes daily. Who's to say there won't be another major earthquake somewhere in California. The after shocks alone would severly affect the state of Nevada which would also endanger the project. Even if an earthquake is predicted there is, according to my knowledge, no way to prevent an earthquake.

There are many alternatives to the placement of radioactive waste, more money should be spent on recycling the waste into something useful, instead of dropping it into a hole so it might be forgotten. I won't forget even though the government will. Just remember that there are always gaps in-between what is written and what is suppose to last for ten-thousand years.

Sincerely,

Cody Iverson, age 18,
6916 Megan ave.
Las Vegas Nv, 89108

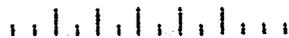
Cody Iverson

CODY IVERSON
6916 MEGAN AVE.
LAS VEGAS NV 89108



DEPARTMENT OF ENERGY
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
YUCCA MOUNTIAN SITE CHARACTERIZATION OFFICE
P.O. BOX 30307 NORTH LAS VEGAS, NV, 89036-0307

Attn: April V. Gil



LENORE and SHERMAN KERNER

1713 Breezewood Drive • Las Vegas, Nevada 89108 • 702/648-6392

May 10, 1997

April V. Gil
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 30307
North Las Vegas, NV 89036-0307

received
90 5/14/97

Dear Ms. Gil:

I think that the proposed Yucca Mountain high-level nuclear waste dump being proposed is a terrible idea.

Nuclear waste should be buried exactly where it is produced. Transporting this waste is a danger to all nearby homes, not to mention those in traffic.

We used to live in West Covina, California, site of the notorious BKK Toxic Waste Landfill. For over 20 years the residents of that area had to put up with the smells, accidents, and leakage from that infamous pile of toxic waste. It could not be contained. Now that toxic dump is closed, thanks to residents who were active and protested.

We are aware of the dangers of toxic waste and now have to go through this again with nuclear waste? No one knows what will happen if an earthquake strikes. To have that much nuclear waste stored near a expanding Las Vegas is just plain stupid.

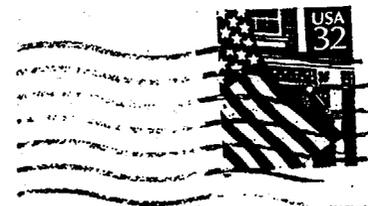
No matter how much public relations is done by DOE in promoting this nuclear waste dump you cannot disguise the dangers. Las Vegans are not fools, **only those with a vested interest are for this dump.**

Sincerely,



Lenore Kerner, Sherman Kerner

Sherm and Lenore Kerner
1713 Breezewood Drive
Las Vegas NV 89108



APRIL V. GIL
DOE, OFFICE OF CIVILIAN
RADIOACTIVE WATE MGT
YUCCA MOUNTAIN SITE CHARAC. OFFICE
P.O. BOX 30307
NORTH LAS VEGAS, NV 89036-0307



8600 W. CHARLESTON #1151
LAS VEGAS, NV 89117
MAY 08, 1997

April V. Gil, U.S. DEPT. OF ENERGY
Office of Civilian Radioactive Waste Management
YUCCA MOUNTAIN SITE CHARACTERIZATION Office
P.O. Box 30307
NORTH LAS VEGAS, NV 89036-0307

received
91 5/14/97

DEAR April V. Gil,

My NAME IS David DOERING, I'M TWELVE YEARS OLD. I AM A BOY SCOUT WITH TROOP 562. OUR TROOP IS WORKING ON THE MERIT BADGE REQUIREMENTS FOR, "CITIZENSHIP IN THE COMMUNITY." I HAVE SELECTED THE YUCCA MOUNTAIN PROJECT AS MY COMMUNITY CONCERN, TO STUDY AND VOICE MY PERSONAL OPINION ON. I HAVE RESEARCHED NEWS PAPER ARTICLES AND I HAVE VISITED THE YUCCA MOUNTAIN SCIENCE CENTER.

I BELIEVE THAT YUCCA MOUNTAIN, NEVADA IS THE RIGHT PLACE TO STORE THE RADIOACTIVE WASTE FROM NUCLEAR POWER PLANTS. I THINK THAT ALL THE SCIENTISTS AND ENGINEERS WHO HAVE WORKED ON THE STUDIES OF THIS PROJECT HAVE MADE SURE THAT IT WILL BE SAFE. I HOPE TO LIVE HERE IN SOUTHERN NEVADA FOR A LONG TIME, SO IT IS IMPORTANT TO ME THAT THEY KNOW FOR SURE HOW SAFE IT WILL BE IN THE FUTURE.

I ALSO HOPE THAT THE STUDIES OF YUCCA MOUNTAIN HAVE NOT INTERFERED WITH THE NATURAL WILDLIFE OF THE AREA. THE FUTURE OF THE ENVIRONMENT IS MOST IMPORTANT TO ALL. THE PLANTS, ANIMALS AND HUMANS ALL NEED THE ENVIRONMENT.

SINCERELY,

David Doering
DAVID DOERING

David Doering
8600 W. Charleston #1151
Las Vegas, Nv 89117



U.S. Dept. Of Energy, Office of Civilian
Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 30307
North Las Vegas, NV 89036-0307

ATTN: April V. Gil

