



GLOBAL RESOURCE ACTION CENTER FOR THE ENVIRONMENT

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67 FR 15257
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Helaine Lerner
Board Chair

To: Michael T. Lesar
Chief, Rules Review and Directives Branch
United States Nuclear Regulatory Commission
Mail Stop T6-D59
Washington DC 20555-0001

Alice Slater
President

Project Directors

Re: Public Comment on Yucca Mountain Review Plan
NUREG-1804, Revision 2

David Brubaker
William J. Weida

The Global Resource Action Center for the Environment strongly opposes the immediate deposit of nuclear wastes at Yucca Mountain, no matter what review process is used.

Advisory Committee

Our opposition stems from several key points, including transportation and long-term storage problems.

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Tens of thousands of shipments of irradiated nuclear fuel will be moving across this country and around its coastlines if the Yucca Mountain Project proceeds. They are dangerous enough with average contemporary accident rates what they are, without further endangering our country's health by the increased deregulation currently advocated by the Department of Transportation's RSPA proposed rule 67 FR 83:21328-21382, 4/30/2002.

Long-term storage criticisms have not been adequately addressed in the public sphere. Even some of the U.S. government's own assessments indicate that Yucca Mountain is not capable of isolating radioactive waste from the environment for this long [*Science for Democratic Action vol. 7 no. 3 (Takoma Park, Maryland : Institute for Energy and Environmental Research), May 1999*].

No matter what review procedures are in place to regulate the Yucca Mountain proceedings, the environmental hazards of this proposal are simply too great to be overcome without great leaps forward in the development of scientific requirements for nuclear safety. As recommended by the *Institute for Energy and Environmental Research*, GRACE advocates a process whereby various kinds of repository types and environments would be studied for ten to fifteen years without any attempt to identify, rank, or screen specific locations as potential repository sites. Only after a significant amount of data is collected and analyzed should a permanent repository site be considered.

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