

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 (NOPR)

DISTRIBUTION AT HEADQUARTERS:

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

CLOSE OF COMMENT PERIOD: March 17, 1997

TODAY'S DATE: February 21, 1997

ATTACHED WRITTEN COMMENT(S)/DOCUMENTS:

- 1. Updated Public Comment Log Sheets (please recycle previous versions)**
- 2. Public Comments**
- # 15 - 23

Note: The original written comments are located in the official agency docket file currently being held by Bob Murray at the Yucca Mountain Site Characterization Project Office in Las Vegas, NV. (702) 295-4894. Andi Kasarsky is coordinating distribution for DOE Forrestal, (202) 586-3012.

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PDR WASTE PDR
WM-11

102.8

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PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes
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	
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	
7	1/23/97	Frankie Sue Del Papa Capitol Complex Carson City, NV 89710	Attorney General, State of Nevada	

PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

Page 2

No.	Date	Name & Address	Title & Organization	Notes
8	1/27/97	Fred Dexter, Jr. Sierra Club - Toiyabe Chapter Southern 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)
12	2/3/97	Mrs. Ruth Niswander 622 Barbara Place Davis, CA 95616-0409	Self	see also Comment #17
13	2/4/97	Richard H. Bryan United States Senate 364 Russell Senate Office Bldg. Washington, DC 20010-2804	U.S. Senator from Nevada	

PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes
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)	
16	2/6/97	Marilyn Elie Adrian Court Cortlandt Manor, NY 10566	Indian Point Project	Phone: (914) 739-6164
17	2/6/97	Ruth Niswander 622 Barbara Pl. Davis, CA 95616	Self	see also Comment #12
18	2/8/97	Russell Todd 15 Orchard Ct. Roslyn Heights, NY 11577 russtodd@juno.com	Self	e-mail
19	2/14/97	Cathy Rosenfield Tworoses4u@aol.com	Self	e-mail

PUBLIC COMMENT LOG - 10 CFR 960 RULEMAKING

No.	Date	Name & Address	Title & Organization	Notes
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	
23	2/19/97	Mark Frederickson 900 17th Ave NE Rochester, MN 55906	Self	



914/682-0488

westchester people's action coalition, inc. 255 grove street box 488, white plains, new york 10602

General Guidelines NOPR Docket #RW-RM-96-100

January 27, 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, NV 89193-8608

received
#15 2/6/97

Dear Ms. Gil,

WESPAC is very concerned that the proposed changes to 10CFR960, "General Guidelines for the Recommendation of Sites for Nuclear Waste Repositories," will have a devastating impact on the process for deciding this country's nuclear waste disposal policy. These changes would essentially exempt the proposed Yucca Mountain site from standards that should apply to all high-level waste dumps, and would also remove potential waste transport issues from consideration of the site. These are both changes for the worse, and must not be enacted.

Currently, guidelines under the Nuclear Waste Policy Act require objective and verifiable standards for any site, including qualifications based on a site's geology, seismic activity, water flow, and population. The Act also calls for the site suitability assessment to include an evaluation of transportation of radioactive waste to the site. Exempting Yucca Mountain from these regulations could mean that the sole high-level nuclear waste repository in the country would be opened without regard to scientific warnings of the site's dangers, or concerns about the dangers of trucking radioactive waste. It is clear that under these changes, selection of the Yucca Mountain site will be based on political compromises and the already huge sums of money spent there, and not on credible evidence that this will be a safe repository.

We urge you to withdraw the rule from consideration. The Department of Energy must preserve technical criteria and include transportation concerns, environmental impact, and socio-economic factors in evaluating the suitability of the Yucca Mountain site. Changing the rules so far into the process imparts an air of bias and hidden agendas. Further, as this change would have potentially dire affects throughout the country, we urge you to extend the comment period for an additional 120 days, and to hold hearings in geographic regions including Portland, Tulsa, Chicago, Indianapolis, Atlanta, and Boston, as well as the Nevada hearing.

Thank you for your attention.

Charles Margulis
Co-director

MARILYN ELIE
ADRIAN COURT
CORTEAULT MANOR, NY 10566
914-739-6164
(RTN ADDRESS ON ENVELOPE)

received
#16 2/6/97

General Guidelines NOPR Docket #RW-RM-96-100

January 27, 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, NV 89193-8608

Dear Ms. Gil,

The Indian Point Project is very concerned that the proposed changes to 10CFR960, "General Guidelines for the Recommendation of Sites for Nuclear Waste Repositories," will have a devastating impact on the process for deciding this country's nuclear waste disposal policy.

These changes would essentially exempt the proposed Yucca Mountain site from standards that should apply to all high-level waste dumps, and would also remove potential waste transport issues from consideration of the site. These are both changes for the worse, and must not be enacted.

Currently, guidelines under the Nuclear Waste Policy Act require objective and verifiable standards for any site, including qualifications based on a site's geology, seismic activity, water flow, and population. The Act also calls for the site suitability assessment to include an evaluation of transportation of radioactive waste to the site. Exempting Yucca Mountain from these regulations could mean that the sole high-level nuclear waste repository in the country would be opened without regard to scientific warnings of the site's dangers, or concerns about the dangers of trucking radioactive waste.

It is clear that under these changes, selection of the Yucca Mountain site will be based on political compromises and the already huge sums of money spent on the site. Not on credible evidence that this will be a safe repository.

We urge you to withdraw the rule from consideration. The Department of Energy must preserve technical criteria and include transportation concerns, environmental impact, and socioeconomic factors in evaluating the suitability of the Yucca Mountain site.

Changing the rules so far into the process imparts an air of bias and hidden agendas. Further, as this change would have potentially dire affects throughout the country, we urge you to extend the comment period for an additional 120 days, and to hold the hearings in geographic regions including Portland, Tulsa, Chicago, Indianapolis, Atlanta, and Boston, as well as the Nevada hearing.

Thank you for your attention.

Marilyn Elie

Marilyn Elie
Indian Point Project

As one who lives in the shadow of Indian Point I find the possibility of high level radio active waste being shipped on Rt 9 half way across the country to a site which does not meet adequate safety standards impossible to understand!!!

received
#17 2/6/94

Feb. 3, 1994

April Gil
Dept. of Energy
Office of Civilian Radioactive Waste Man-
agement
Yucca Mt. Site
Characterization Office
P.O. Box 98608
Las Vegas, Nevada 89193-8608

Dear Ms. Gil:

I object to the Dept. of Energy's proposed new rule that makes exemptions for storage of radioactive waste at Yucca Mt. site. We need to apply the same standards at Yucca Mt. as elsewhere. It is wrong to create lower standards for such a dangerous substance as radioactive waste. It is best to leave the waste wherever it is at this moment than to transport it around the country on roads that go to Yucca Mt. I strongly object to this waste coming anywhere near Davis, California where I live, or, for that matter, near any fellow American's home or work site.

So I object to the DOE's proposed rule change and the general plan of transporting waste to Yucca Mt. Let the waste stay where it is until our technology for safe storage of radioactive waste has advanced. Best of all, stop the whole nuclear program until such time that safe disposal is assured.

Sincerely,
M. Ruth Wiswander
622 Barbera
Davis, Ca. 95616

To: 10cfr960
cc:
From: russtodd @ juno.com at pmdfpo@YMPGATE
Date: 02/08/97 05:31:00 PM
Subject: General Guidelines NOPR Docket Number RW-RM-96-100

received
2/8/97 #18

New Text Item: FILE.TXT

also cc.
Senator Moynihan
Senator D'Amato

This e-mail is about the Dept. of Energy's (D.O.E.) proposal to exempt Yucca Mountain site in Nevada from any specific or verifiable disqualifying factors in evaluation for permanent repository, which is part of Senator Craig's bill S.104.

I'd like to preface my comments with the statement that all bills that the Dept. of Energy initiates about radioactive waste should also include propositions that:

- 1) no new waste can be produced for Nuclear Weapons Production and their development.
- 2) nuclear power as an energy production method produces too much hazardous radioactive waste, therefore all nuclear power plants should be shut down so no new waste is produced.
- 3) nuclear waste will probably have to be kept in above ground storage facilities that can be monitored constantly from above, below and all sides, as the only way to truly determine if the waste is being safely contained.

As far as the D.O.E proposal on Yucca Mountain goes:

- 1) The D.O.E. must consider transportation, socio-economic, and environmental factors in evaluating Yucca Mountain suitability as a permanent nuclear waste repository. We live in a democracy and a land of life, not a colony of the nuclear power and weapons industry and a deserted waste land.
- 2) The D.O.E. is losing Scientific and Public credibility when it tries to drastically change the rules
- 3) The D.O.E. must preserve 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 should be no compromise when it comes to isolation of nuclear waste from the environment.

Thank you

Sincerely yours,

Russell Todd
15 Orchard Ct.
Roslyn Heights, NY 11577

To: 10CFR960
cc:
From: Tworoses4u @ aol.com at pmdfpo@YMPGATE
Date: 02/14/97 08:07:00 AM
Subject: Yucca Mountain

received
#19 2/14/97

New Text Item: FILE.TXT

Has anyone in Washington checked the population figures of the Las Vegas metro area lately? Perhaps you'd notice that this is the fastest growing population anywhere in the United States. Has anyone checked the location of Yucca Mountain? It's on a major fault line 65 miles outside the largest growing population center in the United States!

Has anyone noticed that tourists from around the world flock to this gambling mecca every day of the year. Occupany rates at Las Vegas casinos range in the admirable 85-99% occupany most of the time.

Although I realize you have already turned parts of Nevada into radioactive death traps, I also realize that there are vast open lands all over Nevada, and the U.S. Government owns most of it. Couldn't find anyplace a little farther from a fault line or population center to dump waste that wasn't created here? I'll bet there's a lot of them.

Perhaps you haven't noticed that Nevada doesn't use Nuclear Power. Or that 3 mile island, with it's "contained" level of radioactivity is a dead zone. How do you expect to control accidents as you cart this stuff through all those nuclear power using states to Nevada? Are we really suppose to have that much faith in our government? You don't even want to abide by your own safety standards if it interferes with the "screw Nevada" bill.

Well, when you're the social outcast of the civilized world, after you blow up citizens from around the world, maybe you'll figure out that 65 miles outside a major population and tourist center perhaps wasn't the place to store nuclear waste. But then you won't need to have the powers of critical thinking, it will be in your face devastation that will reach to all corners of the world.

I've got an idea, let's take a more expeditious route to becoming the world pariahs, let's just store the nuclear waste under the United Nations.

Cathy Rosenfield

P.S. Has anyone considered not storing all the nuclear waste in one place, so that if there is a leak, you don't take out half a continent at once?

To: 10cfr960
cc:
From: Private_User @ pepsi.com at pmdfpo@YMPGATE
Date: 02/14/97 05:50:00 PM
Subject: General Guidelines NOPR Docket # RW-RM-96-100

received
#20 2/17/97

New Text Item: FILE.TXT

General Guidelines NOPR Docket # RW-RM-96-100

To whom it may concern,

I would like to urge you to maintain previously established rules and guidelines for all potential sites for the disposal of nuclear waste. I am particularly opposed to efforts to make exceptions for the Yucca Mountain site. Such exceptions appear to be politically motivated. I believe that the same rigorous standards should apply to all nuclear waste disposal sites. The hazards of improper waste disposal far outweigh the problems that would result from the failure to meet a legislated deadline.

Sincerely,

Michael Borok
378 Barway Drive
Yorktown Heights, NY 10598

mborok@pepsi.com
borok@aol.com

STRATHCLYDE ASSOCIATES

5395 Summertime Drive
Las Vegas, Nevada 89122
(702) 453-4757

12 FEBRUARY 1997

received
#21 2/19/97

TO: Ms. April V. Gill
U.S. Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
Post Office Box 98608
Las Vegas, Nevada 89193-8608

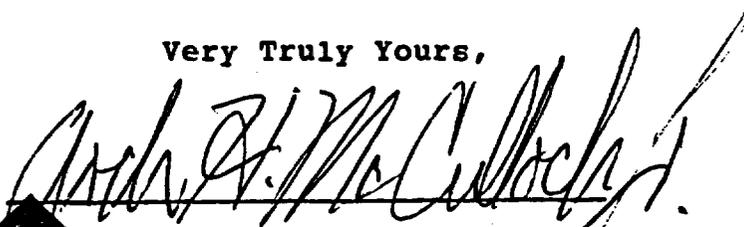
FROM: Arch H. McCulloch Jr.
Strathclyde Associates
5395 Summertime Drive
Las Vegas, Nevada 89122

SUBJECT: Review and Comments on the DOE Proposed
Site-Specific Guidelines for Evaluating
the Suitability of the Yucca Mountain
for the Development of a Repository
for Nuclear/Radioactive Waste

REFERENCE: Proposed Amendment to the General Guidelines
for the Recommendation of Sites for Nuclear Waste
Repositories as published in the Federal Register
Volume 61, Number 242, Monday, 16
December 1996, Pages 66158 thru 66169

The purpose of this correspondence is to forward eight (8) copies of my comments from a review of the referent DOE proposed Amendment to the General Guidelines for the Recommendation of Sites for Nuclear Waste Repositories. I am unable to provide an electronic copy of these comments which would be compatible with your Word Perfect 6.1 for Windows.

Very Truly Yours,



Arch H. McCulloch Jr.
Strathclyde Associates

COMMENTS FROM A REVIEW OF THE DOE PROPOSED AMENDMENT
TO THE GENERAL GUIDELINES FOR THE RECOMMENDATION OF SITES
FOR NUCLEAR WASTE REPOSITORIES
BY STRATHCLYDE ASSOCIATES
LAS VEGAS, NEVADA

THE FOCUS ON A SITE-SPECIFIC SYSTEM PERFORMANCE APPROACH

Reference (a): II.A.2. Page 66161.4th Paragraph

"The DOE has now advanced its site-specific conceptual design to focus on the surface and subsurface facilities, the waste package, and a concept of operations to describe how an operational repository would function at Yucca Mountain."

Reference (b): II.B. Page 66161.2nd and 3rd Paragraphs

"The proposed subpart would focus on the ability of a repository system at the Yucca Mountain site to protect public health and safety by adequately containing and isolating waste, rather than on evaluating each technical aspect of the site independently. This new subpart would represent a change for evaluating Yucca Mountain from the Guideline's general site screening and comparison approach to a site-specific system performance approach. The results of integrated assessments of system performance in Subpart E would provide a more meaningful indicator of the ability of a repository to protect public health and safety, before and after permanent closure, than would separate evaluations of individual site characteristics."

Reference (c): Section 960.6. Page 66169

"Yucca Mountain Site Guidelines. ... Compliance with the postclosure system guideline shall be determined by the ability of a geologic repository to meet the applicable standards through a postclosure system performance assessment. Compliance with the preclosure radiological safety system guideline shall be determined by the ability of a geological repository to meet the applicable standards through a preclosure performance assessment."

COMMENTARY - A system configuration is specified in terms of its physical and functional characteristics/requirements. Reference (a) is consistent with this engineering practice, but references (b) and (c) are not as they focus solely on the system's functional characteristics/requirements. Surface and subsurface facilities as well as waste packages have physical and functional characteristics/requirements. So a focus directed toward assessments of system performance has a prerequisite responsibility to determine/assess system compliance with its specified physical and functional characteristics/requirements.

During system development and design, the focus is on both physical and functional characteristics/requirements. In the construction phase, the physical characteristics/requirements would be the primary focus. In the preclosure and postclosure phases, the functional characteristics/requirements would be the primary focus.

In Paragraph 2 of reference (b), the phrase, "... by adequately containing and isolating waste, ...", is of concern because the requirement to contain and isolate waste to ensure public health and safety should be significantly more absolute (e.g., compliance with the tolerances in requirements specified in EPA and NRC Regulations) than the term, "adequately", would infer.

COMMENTS FROM A REVIEW OF THE DOE PROPOSED AMENDMENT
TO THE GENERAL GUIDELINES FOR THE RECOMMENDATION OF SITES
FOR NUCLEAR WASTE REPOSITORIES
BY STRATHCLYDE ASSOCIATES
LAS VEGAS, NEVADA
(continued)

EXCLUSION OF SIGNIFICANT AND CRITICAL CONSIDERATIONS

Reference {d}: II.B.Page 66162.4th Paragraph

"In the absence of a need to consider siting alternatives, the DOE is not specifying separate system guidelines for environmental, socioeconomic, and transportation considerations in subpart E, The DOE will not require or make findings with regard to such considerations as part of any evaluation of the suitability of the Yucca Mountain site for recommendation."

Reference {e}: II.A.1.Page 66160.2nd Paragraph

"In Section 801 of the Energy Policy Act of 1992, Congress directed the EPA to promulgate new site-specific health and safety standards for protecting the public from radioactive releases at a repository at Yucca Mountain. ... Congress also directed the NRC to revise its regulations to be consistent with the new EPA standards."

Reference {f}: II.B.3.Page 66164.1st Paragraph

"The postclosure and preclosure system guidelines of subpart E would each contain a single qualifying condition that the geologic repository at Yucca Mountain must meet in order for the site to be found suitable for development as a repository. The qualifying condition in both cases would provide that the geologic repository shall be capable of limiting radioactive releases as required by the site-specific standards to be promulgated by the EPA pursuant to the Energy Policy Act of 1992. The 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 those standards. Because the NRC must conform its regulations to the EPA standards, these guidelines also refer to the NRC regulations supplementing those standards."

Reference {g}: I.A.Page 66158.Section 114

"... The 1982 NWA provided that this recommendation by the Secretary to the President was to be accompanied by a final Environmental Impact Statement (EIS) in accordance with the requirements of the National Environmental Policy Act (NEPA), as modified by section 114 of the 1982 NWA."

COMMENTARY - In reference {d}, the phrase, "In the absence of a need to consider siting alternatives, ...", is not a sufficient justification for excluding environmental, socioeconomic, and transportation considerations from Subpart E as well as the ultimate DOE recommendation concerning the suitability of the Yucca Mountain Site.

References {e}, {f}, and {g} cite requirements directed to the DOE as well as an expression of DOE intent in reference {f} that clearly call for DOE considerations of environmental and socioeconomic factors in the development and justification of a site-specific suitability recommendation. It is conceivable that requirements in EPA standards and the EIS could cause the inclusion of transportation considerations in the site-specific suitability recommendation process.

COMMENTS FROM A REVIEW OF THE DOE PROPOSED AMENDMENT
TO THE GENERAL GUIDELINES FOR THE RECOMMENDATION OF SITES
FOR NUCLEAR WASTE REPOSITORIES
BY STRATHCLYDE ASSOCIATES
LAS VEGAS, NEVADA
(continued)

EXCLUSION OF SIGNIFICANT AND CRITICAL CONSIDERATIONS (continued)

Apparently, DOE considers the transport of radioactive waste and spent nuclear fuel from existing temporary storage sites and future source sites to be a system other than the Yucca Mountain Repository Site System, by excluding transportation considerations from Subpart E. However, in reference (a), DOE's site-specific conceptual design is to focus on the surface and subsurface facilities, the "waste package", and a "concept of operations" to describe how an operational repository would function at Yucca Mountain. (This conceptual design is apparently detailed in III.References.Page 66165. Item 21.) There will be a significant operational interface between the Yucca Mountain Repository System and the Transportation System in terms of input parameters to the Repository System. Definition and control of such an interface is normally delineated in an Interface Specification reflecting acceptance by both system managers. This Interface Specification should be included in Subpart E in a manner similar to that of EPA standards, NRC regulations, and the EIS.

In summary, environmental, socioeconomic, and transportation considerations are essential prerequisite requirements in the development of a site-specific suitability recommendation. The declaration of intent by DOE, in reference (d), to exclude such considerations is troublesome and confusing, if true. If this declaration of intent cannot be deleted, it should at least be expanded to explain how these considerations will be included and evaluated in the site-specific suitability recommendation process.

received
2/19/97 #22

George Crocker
5093 Keats Ave. No.
Lake Elmo, MN 55042

February 10, 1997

April V. Gil
US. Dept of Energy OCRWM
Yucca Mountain Site Characterization Office
P.O. Box 98608
Las Vegas, NV 89193-8608

RE: Proposed Revision of the General Guidelines for the
Recommendation of Sites for Nuclear Waste Repositories.

Dear Ms. Gil:

DOE proposes changing rules governing development of nuclear waste repositories so they do not apply to the repository now under consideration. DOE claims the change is needed because Yucca Mountain site characterization data cannot be compared with any other potential nuclear waste storage site, as no such site exists. DOE maintains that the guidelines are therefore obsolete.

Existing qualifying and disqualifying conditions are likely to cause Yucca Mountain to be removed from the list of potential site repositories, because analysis of those conditions indicates an unacceptable threat of nuclear contamination. In other words, the ability to compare Yucca Mountain site characterization data with similar data from other potential sites is not the only or the major reason to develop the data and apply the guidelines. There are also site specific risk assessment requirements.

Or perhaps DOE is of the opinion that these guidelines should not apply to the next repository, either. If this is the case, the proper DOE action would be to propose abolishing these rules, rather than the sophistry and subterfuge of the proposed revision.

One wonders what would happen if rule revisions such as DOE contemplates were applied to rules governing other human activities. Murder in the first degree, for example. This murder would in general be illegal, and harsh sanctions against such behavior would remain on the books. But this time, because in this situation there was only one potential sacrificial soul, we'll just move on. For the future, we will prescribe rules that are more appropriate to a situation in which the killer has more choices.

This proposed DOE rule revision contaminates the fabric of society, and contributes to attitudes and behavior that make responsible management of nuclear waste virtually impossible.

Please. Extend the comment period.

April V. Gil
February 10, 1997
Page Two

And, when you are done with this absurdity, let us know if you are interested in a responsible federal nuclear waste management program that has a chance at success.

Sincerely,


George Crocker

cc Nevada Nuclear Waste Task Force

April V. Gil
US Dept of Energy, OCRWM
Yucca Mtn Site Char Office
PO Box 98608
Las Vegas, NV 89193-8608



April,

2/10/97

Please include my comments in the public record regarding the DOE's proposed revisions of rules for the Yucca Mtn nuclear waste repository.

I am against DOE's proposed rule changes which would exempt Yucca Mtn from following the present General Guidelines for the Recommendation of Sites for Nuclear Waste Repositories. It seems absurd and irresponsible to exempt Yucca Mtn from these safeguards and rules, especially since Yucca Mtn is the first and only site now being considered for a national nuclear waste repository. We must ensure that whatever site is studied, that it meets all the criteria necessary to safely store this hazardous waste for tens of thousands of years. This is a problem that we are going to pass on to our children, and their children. We must not be in such a hurry now that we give a wink and a nod to quick approval of a site which will have so much riding on it. I strongly believe that consideration of transportation, geologic, scientific, environmental, and hydrologic factors should and must play a large role in finding a suitable national site. I have a strong suspicion that when transportation logistics and security factors are entered into the picture we will decide that keeping nuclear waste in the states it is generated in will prove to be the safest, most economical, and practical.

There have been numerous concerns already raised about the suitability of the Yucca Mtn site. This move to exempt Yucca Mtn from present guidelines has the appearance of bowing to the nuclear industry which finds itself in a tough position with regards to the radioactive waste they have produced. I am strongly opposed to any plan of scheme which transfers the responsibility, title, or cost of their nuclear waste problem over to the American taxpayers. They profited from its generation, now they should bear the burden of dealing responsibly with its waste. If Yucca Mtn can not meet the safety rules, then it is not right, proper, or ethical to change the rules. These are laws, rules, and regulations that directly affect the public health and safety. Lets not weaken them.

Sincerely,

Mark Frederickson
900 17th Ave NE
Rochester, MN 55906