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August 19, 1986

Mr. Ben Rusche  
Director,  
Office of Civilian Radioactive Waste Management  
U.S. Department of Energy  
1000 Independence Ave., S.W.  
Washington, D.C. 20585

WM Record File

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WM Project

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Docket No.

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Dear Mr. Rusche:

I very much appreciated talking to you about the analysis and decision process that led to the recommendation of the Yucca Mountain, Hanford, and Deaf Smith sites for characterization. Our telephone conversation and my discussion with Tom Isaacs here in Los Angeles last week made it clear that a serious attempt was made to balance the analysis results against non-analysis considerations. Our discussions also allowed me to formulate my main concerns more concisely.

First, the Recommendation Report (DOE-S-0048) does not represent the analysis results reported in the Methodology Report (DOE-RW-0074) in a balanced way. In fact, from reading the Recommendation Report, it is hard to recognize that the analysis arrived at the following firm and stable rank ordering of the sites: Yucca Mountain, Richton Dome, Deaf Smith, Davis Canyon, and Hanford. In my opinion, the Recommendation Report clearly fails to communicate the content of the Methodology Report in its entirety.

Second, the value implications of recommending to characterize the Yucca Mountain, Hanford and Deaf Smith sites are inconsistent with the judgments made by your experts and staff during the analysis. Even extensive sensitivity analyses on these value judgments were not able to change the stable rank ordering arrived at in the analysis.

Third, and this is a personal judgment, I found the value judgments made within the framework of the analysis very reasonable, while I thought that those implied by the final decision were not. In particular, I did not find it reasonable to select sites for characterization that cost billions of dollars more than other sites and that have seemingly little advantages that would justify the additional costs.

Thank you again for the opportunity of discussing these issues with you and your staff.

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Sincerely,

Detlof von Winterfeldt

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