

As of: 10/30/15 2:57 PM  
Received: October 22, 2015  
Status: Pending\_Post  
Tracking No. 1jz-8l1t-wx4y  
Comments Due: November 20, 2015  
Submission Type: Web

# PUBLIC SUBMISSION

**Docket:** NRC-2015-0051

Department of Energy; Yucca Mountain, Nye County, Nevada; Supplemental Environmental Impact Statement

**Comment On:** NRC-2015-0051-0004

Department of Energy; Yucca Mountain, Nye County, Nevada; Correction and Extension of Comment Period

**Document:** NRC-2015-0051-DRAFT-0024

Comment on FR Doc # 2015-23510

38

## Submitter Information

**Name:** Bill Stremmel

**Address:**

1901 E. Calvada Blvd.

Apt.# 3

Pahrump, NV, 89048-5887

**Email:** billsherbs@sbcglobal.net

8/21/2015  
60 FR 50875

RECEIVED

2015 OCT 30 PM 3:11

RULES AND DIRECTIVES  
BRANCH  
15150

## General Comment

YMEIS - Supplement

DOE docket no. 06300001

NRC docket no. 2015-0051

ML15238B507

comments due

November 20th, 2015

United States Nuclear Regulatory Commission

Annapolis, MD

Following comments are synopsis of my full commentary submitted via the attached Microsoft Word document:

Analysis of Yucca Mountain proposed facility impact should not be isolated from current practice of trucking into Nevada DOD and DOE waste from a multiplicity of sites around the country besides the 100+

SUNSI Review Complete  
Template = ADM - 013  
E-RIDS = ADM-03.  
Add = C. Calvada (cbv1)

commercial nuclear power plants. Risks of both transportation and storage compounded by leakage already occurring within the NNSS and outside at private repositories such as US Ecology near Beatty, Nevada are ongoing if Yucca Mountain is left in mothballs.

All waste should be on trains for as much of the trip as possible because steel-wheel-on-steel-rail technology is inherently self-steering and less vulnerable to accidents than rubber-tired trucks roaming paved highways. While it may not be practical to extend rail lines for what is coming in now, addition of spent fuel encased in dry casks would make extension of a rail line from Hawthorne or Caliente more of a realistic option to reduce riskier truck traffic currently using public highways.

Likewise, investment in corrective/mitigating measures for leakage of radioactive waste, some it high-level, now occurring from within NNSS and nearby private sites, cannot happen while the stalemate over Yucca Mountain continues. But a program addressing all of the hydrological concerns expressed by residents of Shoshone and Amargosa Valley could be funded in an infrastructure package for Nevada predicated on the state's cooperation with the centralized repository. A pilot solar-powered, reverse-osmosis desalination pipeline from the coast across California's "Inland Empire" into Nevada could provide an alternate source of potable water if the groundwater is contaminated. Once proven on a demonstration scale, larger pipelines conveying seawater to inland basins could reduce coastal flooding and reduce current dwindling sources for parched cities and farms. Massive investment to complete the Yucca Mountain repository justifies allocation for a complete revamping of DOD/DOE practices for all radioactive waste from around the country into the NNSS + vicinity so that the centralized repository will be an environmental plus for its neighbors.

Opponents of Yucca Mountain assert that its selection was political, and that politics of siting the repository in a then less populated state trumps the science of whether the geology is optimal for the long term. But geology is not the whole question, for when it comes to nuclear waste past practices as well as what is best going forward must be taken into consideration. Yucca Mountain is adjacent to the Nevada National Security Site where exactly 100 above-ground and many more underground test nuclear weapons explosions were conducted between 1951 and 1992. Indeed, as reported in the September 22, 2015 issue of The Guardian, the Nevada Test Site, the western boundary of which Yucca Mountain sits astride, is the most heavily bombed place on Earth - and all of those explosions were nuclear. Testing left radioactive fallout in the soil and water that can only be ameliorated by time for radioactive decay.

Waste from the Manhattan Project and many subsequent nuclear activities around the country has been trucked into Nevada for storage in the NNSS since the earliest days of the Cold War. Spillages have occurred. Leakage from sites of much inferior design housing waste in much less durable encasement is a perpetual problem. Monday, October 19, fire at a closed radioactive materials facility near Beatty forced closure of a 160-mile stretch of US-95 for much of the day. So the site of Yucca Mountain and its vicinity cannot be regarded as "pristine" without any respect to the legacy of nuclear testing, transportation and storage of waste.

Securing cooperation of state authorities will be much more difficult than securing dry casks under Yucca Mountain. But it should be possible if the US-EPA, DOE and DOD jointly carry out an assessment of ALL hazardous waste sites - nuclear and otherwise - in southern Nevada, determining feasibility of leaving the waste in improved isolation or moving it to another more geologically-suitable site, and fully-funding the multi-billion \$ cost of doing whatever is necessary to put Nevadan's minds at ease. Since most of this waste comes from elsewhere around the country via interstate transportation, it may be more appropriate for the federal government to unify management of these sites under a single new authority equal to that of EPA, DOE, DOD.

Secure, long-term storage is the end of any nuclear fuel cycle. Yucca Mountain is the most appropriate

closing chapter to this difficult saga.

Sincerely,

Bill Stremmel

---

## **Attachments**

comments-by-WJS-to-NRC\_YMEIS\_due-Nov-20-2015

comments  
by  
Bill Stremmel  
to

U.S. NRC

on

YMEIS – Supplement  
DOE docket no. 06300001  
NRC docket no. 2015-0051  
ML15238B507

due

November 20th, 2015

United States Nuclear Regulatory Commission  
Annapolis, MD

Analysis of Yucca Mountain proposed facility impact should not be isolated from current practice of trucking into Nevada DOD and DOE waste from a multiplicity of sites around the country besides the 100+ commercial nuclear power plants. Risks of both transportation and storage compounded by leakage already occurring within the NNSS and outside at private repositories such as US Ecology near Beatty, Nevada are ongoing if Yucca Mountain is left in mothballs. Indeed, the State of Nevada's obstinacy with respect to merely studying Yucca Mountain to the point of obsession with stopping that project may have allowed DOD and DOE to be less vigilant over the waste transportation and storage currently going on.

All waste should be on trains for as much of the trip as possible because steel-wheel-on-steel-rail technology is inherently self-steering and less vulnerable to accidents than rubber-tired trucks roaming paved highways. While it may not be practical to extend rail lines for what is coming in now, addition of spent fuel encased in dry casks would make extension of a rail line from Hawthorne or Caliente more of a realistic option to reduce riskier truck traffic currently using public highways. Recent designation of the "Basin & Range" National Monument, the ulterior motive for which was to block the Caliente rail route through Lincoln County, Nevada, is not cast in stone. It may be rescinded in amendments to the Antiquities Act under which it was created. Opening Yucca Mountain should be a reassurance to motorists on Interstates 15 + 80, US highways 6 + 95, California 127 + 178, and Nevada highways 160 + 372.

Likewise, investment in corrective/mitigating measures for leakage of radioactive waste, some it high-level, now occurring from within NNSS and nearby private sites, cannot happen while the stalemate over Yucca Mountain continues. But a program addressing all of the hydrological concerns expressed by residents of Shoshone and Amargosa Valley could be funded in an infrastructure package for Nevada predicated on the state's cooperation with the centralized repository. A pilot solar-powered, reverse-osmosis desalinization pipeline from the coast across California's "Inland Empire" into Nevada could provide an alternate source of potable water if the groundwater is contaminated. Once proven on a demonstration scale, larger pipelines conveying seawater to inland basins could reduce coastal flooding and reduce current dwindling sources for parched cities and farms. Massive investment to complete the Yucca Mountain repository justifies allocation for a complete revamping of DOD/DOE practices for all

radioactive waste from around the country into the NNSS + vicinity so that the centralized repository will be an environmental plus for its neighbors.

Many opponents to the Yucca Mountain repository focus their criticisms to the potential – and greatly over-hyped risk to Nevada and the Death Valley area of California. However pros and cons of long-term storage in a centralized facility cannot exclude the ongoing impact of leaving the spent fuel rods at over 100 locations scattered around the country where commercial nuclear power plants have been operating. Above-ground and vulnerable to both natural calamity and intentional terrorism, every single one of these sites poses a greater risk than the tunnels under Yucca Mountain. Collectively it is a national disgrace and a huge international liability, since, once released, radioactivity knows no bounds.

Spent fuel rods in storage ponds are highly vulnerable as the ponds require an uninterrupted source of electricity to power pumps essential for maintaining a continuous flow of water. Both planes that were crashed into the World Trade Center on 9/11 flew directly over the Indian Point nuclear power plant on the Hudson River. If cooling ponds outside of the reactor containments had been targeted instead, the resulting dispersal of radioactive substances would have necessitated immediate evacuation of 16 million people living within a 50-mile radius, including all of New York City. These potential targets for terrorism exist wherever a reactor has operated near a metropolitan area.

Even after the rods have cooled sufficiently to be encased in dry casks, storing them next to the reactor is inherently less secure than in a centralized facility. It is much more problematic to monitor and secure over one hundred civilian power reactor sites than one single site managed to the highest standards by the federal government.

Although a few dozen reactors have been decommissioned, this job cannot truly be finished while waste from past operations – in whatever form and no matter how packed – remains onsite. Elaborate security must remain in place to guard a perimeter of concrete walls and barbed wire fences. The physical presence of these plants and awareness of high-level waste onsite depresses property values for miles around. Land they sit on cannot be reclaimed for other use while spent fuel cannot be removed to centralized storage. The real estate occupied is often prime waterfront since most of the plants drew water for cooling.

Several comments in the October 15<sup>th</sup> teleconference stated that spent fuel rods in cooling ponds at the recently shut down San Onofre plant and partially-decommissioned Zion reactors were being solidified into dry casks, the implication being that, if replicated at the other civilian power plants, this would be an alternative to storage in one national repository. But mere solidification does not free up the real estate, remove the target for terrorism, or completely remove risk of accident from adjacent communities.

Finally, opponents of Yucca Mountain assert that its selection was political, and that politics of siting the repository in a then less populated state trumps the science of whether the geology is optimal for the long term. But geology is not the whole question, for when it comes to nuclear waste past practices as well as what is best going forward must be taken into consideration. Yucca Mountain is adjacent to the Nevada National Security Site where exactly 100 above-ground and many more underground test nuclear weapons explosions were conducted between 1951 and 1992. Indeed, as reported in the September 22, 2015 issue of The Guardian, the Nevada Test Site, the western boundary of which Yucca Mountain sits astride, is the most heavily bombed place on Earth – and all of those explosions were **nuclear**. Testing left radioactive fallout in the soil and water that can only be ameliorated by time for radioactive decay.

Waste from the Manhattan Project and many subsequent nuclear activities around the country has been trucked into Nevada for storage in the NNSS since the earliest days of the Cold War. Spillages have occurred. Leakage from sites of much inferior design housing waste in much less durable encasement is a perpetual problem. Monday, October 19, fire at a closed radioactive materials facility near Beatty forced closure of a 160-mile stretch of US-95 for much of the day. So the site of Yucca Mountain and its vicinity cannot be regarded as "**pristine**" without any respect to the legacy of nuclear testing, transportation and storage of waste.

Perhaps the next phase of studies will find some minor faults in the geology of Yucca Mountain that without due respect to its nuclear legacy, determine it to be less ideal for long-term stability than say, Arizona. But Arizona, where there have been no nuclear activities besides routine operation of power plants, IS **pristine**. There is no point of having to establish a newly secured facility with separate perimeter and road/rail access confronting millions of Arizonans with the same perceived risk that has always been present for residents of Southern Nevada since the dawn of the Atomic Age.

The decrepit state of America's infrastructure is becoming a major issue in the next election. That Yucca Mountain has languished for so many years that the federal government is now paying back fees it collected from utilities for its construction is the worst example of a worthwhile project stymied by Not in My Back Yard ( NIMBY ) petulant politics fanned by a fear-mongering hysteria. Yucca Mountain cannot be moved. But once studies are complete, and assuming that no fatal flaws are found in the geology and that suitable transportation can be arranged, DOE has to move a mountain of fear and misinformation to secure local cooperation.

Securing such cooperation will be much more difficult than securing dry casks under Yucca Mountain. But it should be possible if the US-EPA, DOE and DOD jointly carry out an assessment of ALL hazardous waste sites – nuclear and otherwise – in southern Nevada, determining feasibility of leaving the waste in improved isolation or moving it to another more geologically-suitable site, and fully-funding the multi-billion \$ cost of doing whatever is necessary to put Nevadan's minds at ease. Since most of this waste comes from elsewhere around the country via interstate transportation, it may be more appropriate for the federal government to unify management of these sites under a single new authority equal to that of EPA, DOE, DOD.

America's engineers can work wonders with technology. Lay people are understandably cynical about technological solutions after technology has been so terribly misused over past centuries. In retrospect different reactor designs and fuels should have been used by civilian power reactors. Reprocessing would have greatly reduced the volume of waste. Decisions about reactors, fuels, and President Carter's curtailment of reprocessing leave a much greater volume of higher-level waste than would have existed had a different path been taken by America's nuclear power industry.

This legacy cannot be wished away by local politicians and anti-nuclear activists, who, from their comments on October 15, appear to be in various states of denial. Secure, long-term storage is the end of any nuclear fuel cycle. With information available now Yucca Mountain is the most appropriate closing chapter to this difficult saga.

Sincerely,

**Bill Stremmel**, 1901 E. Calvada Blvd., apt.#3, Pahrump, Nevada 89048-5887  
Email: [billsherbs@sbcglobal.net](mailto:billsherbs@sbcglobal.net) cellular / text: 925-639-1446  
land-line: 775-727-7932