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105

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## General Comment

Comments on the Yucca Mountain Nuclear Waste Repository Supplemental EIS, NUREG 2184 Submitted to Docket # NRC-2015-0051 on November 20, 2014 via <http://www.regulations.gov>

These comments are being offered on behalf of myself.

TOPIC A: Why the Draft SEIS on Yucca Mountain should be rejected as invalid

How can NRC Staff reflect upon sorption on rock when the characteristics of the waste and the characteristics of the waste container are not known. Policy changes that NRC approved allowing for significant changes in waste composition and incidentally waste form, combined with failure of DOE to deliver the TAD container that is assumed in the TSPA make the claim that NRC can project "sorption on rock surfaces" absurd.

Since the TSPA work was done by the DOE so many factors have changed, (not only new understandings about radiological impacts, but also the characteristics of the source term in the waste, metallurgical and mechanical aspects of containers, chemical aspects of the Yucca substrate and social concerns like how long the waste will be stored prior to shipment) the conclusions of the TSPA must be rejected today.

The Draft SEIS analysis of impacts uses the concentration of contaminants in the groundwater at the regulatory compliance location as a starting point. That location is 11 miles south of, and down the flow path of groundwater from the Yucca Mountain repository location. This is the point at which the safety of the repository's long term performance must be demonstrated by an analysis that shows the radionuclide dose to an individual at that location does not exceed the regulatory dose limit set by the EPA and NRC. That analysis

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is done by use of an elaborate computer program known as the Total System Performance Assessment (TSPA) that is intended to account for all the factors, both natural and engineered, including the waste inventory, that affect the waste concentration and individual dose at the regulatory compliance location. Until the new mission of the proposed Yucca Mountain repository is established, and the TSPA analysis result is adjusted, the starting point of the Draft SEIS for groundwater and groundwater discharge impacts is unknown, and the Draft SEIS conclusion is incorrectly presumptive and lacks a credible technical basis.

F. NRC has mischaracterized local ecological factors, including the springs volume

The Nature Conservancy and the Amargosa Conservancy have funded hydrogeological investigations in the waters of the Middle Amargosa Basin- the Shoshone and Tecopa area- for a decade. These investigations have revealed new knowledge about the sources of the water flowing from our abundant and life-giving springs, and have also confirmed beyond a doubt ideas about the water which were long speculated on but never known for certain. This work has been most recently reported by Andy Zdon, in his "State of the Basin Report 2014," which we will be happy to provide to the Nuclear Regulatory Commission and any other interested parties.

The most pertinent conclusion of the State of the Basin Report to the current discussion is that there is indeed a hydrologic connection between the Amargosa Desert and the springs of the Middle Amargosa Basin. This connection is greatest at the springs on the western side of the Basin, particularly Shoshone Spring and Borax Spring. Waters emerging from those springs at least partially originated right here where we stand this evening.

The analysis presented in the EIS ignores this connection. Section 2.2.2 says that transport beyond Alkali Flat is "unlikely," and then denigrates our stretch of the River as "small, intermittent springs." I would encourage each person involved in the preparation and evaluation of this EIS to travel down the river to Shoshone and Tecopa- your "small, intermittent springs" are perennial gushers, flowing at hundreds or even thousands of gallons per minute every day of the year.

The analysis presented in the EIS Supplement and in previous EISs is insufficient, and the Middle Amargosa Basin must be analyzed in this supplement. Additionally, past EISs need to be updated to reflect the latest science and data. To do anything less is to subvert both the letter and intent of the National Environmental Policy Act.

G. Environmental Justice: impacts off-site in Shoshone cultural area

Section 3.4 of the SEIS on the proposed nuclear waste repository at Yucca Mountain is on Environmental Justice. NRC is required by the 1994 Executive Order 12898: "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" in the SEIA. Unfortunately the NRC staff repeat, only to dismiss the concerns of the Timbisha Shoshone people.

Therefore, the Yucca Mountain Nuclear Waste Repository should never be opened as a national depository for highly toxic nuclear waste.

Respectfully Submitted,  
Carol Levin