

As of: 11/23/15 1:18 PM
Received: November 20, 2015
Status: Pending_Post
Tracking No. 1jz-8mdd-v8v7
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-0125

Comment on FR Doc # 2015-23510

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8/21/2015
80 FR 50875

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RULES AND REGULATIONS

General Comment

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

The overall issue regarding the proposed Yucca Mountain Nuclear Waste Repository is that is is an idea without substance in fact, when considering science and engineering, as there is no data from experience to validate hypotheses about the behavior of abandoned man-made radionuclides over up to a million years. What is known is that ionizing radiation cannot be turned off, must be shielded and monitored through every generation into eternity, unless at some future time a better management of the accumulated and accumulating nuclear material is discovered, validated, and implemented. Until then, it is the moral obligation of this generation to stop making radioactive material and to educate succeeding generations on the best shielding and monitoring practices. Furthermore, it is disingenuous of nuclear advocates and profiteers who have little financial risk or liability in the production of the nuclear waste legacy (due to federal loan guarantees, the Price-Anderson Act, rate payer bailouts, federal ownership of nuclear waste once removed from the utilities' site) to ignore the cost burden on this and all future generations of the management of the nuclear waste utilities are producing. Utilities bear little financial risk, gain the profit, and the public carries the financial burden that has yet to be calculated or even discussed. Most important, however, is the known impact of ever expanding exposure to man-made radionuclides: broad spectrum illness, morbidity, and genetic mutations.

*SOUSI Review Complete
Template = ADM-013*

*E-RIDS = ADM-03
Add = C. Fenech (clerk)*

Humans are the only species that is fatally soiling its own nest, at an ever accelerating rate.

Waste Inventory Is Now Changed and Uncertain:

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 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.

High burn-up fuel and why the SEIS does not adequately consider it:

Regarding high burn-up - If there is not the 7,000 MTU of defense waste in the repository it could possibly be made up by adding more commercial waste to fill the 70,000 MTU statutory capacity. Some or all of that 7,000 MTU could be waste generated after the mid 1990's when the NRC approved the use of high burn-up fuel in reactors. Since the DOE did not consider this in its Total System Performance Assessment (TSPA) this is a problem, because high burn-up fuel (above 45Gwd) has more fission products, has more plutonium and other heavier-than-uranium elements and is thermally hotter and none of these are factored in the TSPA calculations.

Vic Macks