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RULES AND DIRECTIVES BRANCH USNRC

Name: Theodora Tsongas

General Comment

Comments to: the U.S. Nuclear Regulatory Commission
From: Dr. Theodora Tsongas
Re: Docket ID NRC-2015-0051; Report # NUREG-2184

I am an environmental health scientist with 39 years experience evaluating the risks of exposure to environmental contaminants. I am commenting because of my great concerns about the proposal to use Yucca Mountain as a high-level radioactive waste dump. This proposal was cancelled in 2010 by President Obama as "unworkable". The State of Nevada has opposed this proposal for decades. The Western Shoshone have long resisted the racism inherent in the Yucca Dump proposal, as well as violation of the 1863 Treaty of Ruby Valley. Why are the protests of the local communities as well as the President of the United States being ignored by the Nuclear Regulatory Commission?

The Draft Supplemental Environmental Impact Statement (DSEIS) is inadequate and underestimates the adverse impacts on the environment, human health, and the spiritual beliefs and life-ways of local communities. Calculations of risk did not use a culturally appropriate context and as such could not conduct a rigorous risk assessment. Furthermore, failure to investigate cumulative risk of exposures to radiation flies in the fact of current scientific understanding. An international cohort study* found strong positive associations between long term, low-dose radiation exposure and leukemia mortality. These findings provide estimates of risk per unit protracted dose in ranges typical of environmental, diagnostic and occupational exposures. Thus, the conclusion that radioactive releases from the proposed Yucca Mountain high level radioactive waste dump would be SMALL, minimal and harmless, is false and misleading.

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The potential adverse impacts to downstream ground and surface waters are greatly underestimated by the DSEIS. The potential for leaks into groundwater from radioactive wastes buried at Yucca Mountain is high, with potentially devastating effects on current drinking water and agricultural irrigation water sources over a broad region downstream. With continued and new concerns over water scarcity and droughts in the Western U.S., any threat to water supply must be avoided. Water is our first priority, and prevention is the only way to avoid a potential catastrophe.

Finally, the Treaty Rights of the Shoshone Indian Nation must be obeyed as the Law of the Land.

*K. Leurand, D.B. Richardson, E. Cardis et al. Ionising radiation and risk of death from leukaemia and lymphoma in radiation-monitored workers (INWORKS): an international cohort study. Lancet Haematol 2015;2:e276-81.