

Reynolds Electrical & Engineering Co., Inc.

INCOMING CORRESPONDENCE LOG

REQUEST FOR ORAL PRESENTATIONS

Log No.	Date	Received From:	Nature of Inquiry/Request	Action
NSC-8	03-14-83	Katherine Gardiner Hale, 1101 Keystone Ave., Reno, NV 89503	Requests time to speak in a.m. at Reno Hearing	Copy to Roberts & West
NSC-9	"	J. F. Robinson, 710 Robin Street Reno, NV 89509	Request to speak and also request for outline (Reno)	ditto
NSC-10	03-15-83	Abby Johnson, Citizen Alert, P.O. Box 5391, Reno 89513 Alt. Addr: P.O. Box 1681, LV 89101	Request to speak at Reno hearing (early p.m.)	2 copies to PAW for DOE
NSC-12	03-16-83	Steve Bloomfield, M.D., 373 W. Arroyo, Reno, NV 89509	Request to speak at Reno hearing (Citizens Alert . . .)	2 copies to PAW for DOE
NSC-14	03-17-83	Sym O. Morris, 14090 Tourmaline Drive, Reno, NV 89511	Req. to speak at Reno, behalf of N.A.A.V.	
NSC-15	"	Cynthia K. Mitchell, 1011 Washington Reno, NV 89503	Req. to speak at Reno, behalf of self	
NSC-16	"	Josepah H. Robertson, 920 Evans Ave., Reno, NV 89512	Req. to speak at Reno be- tween 10 & 11 a.m.	
NSC-17	"	Bill Vincent, Southern Coordinator of Citizen Alert, P.O. Box 1681, LV, NV 89101	Req. to speak at LV hearing behalf of Citizen Alert	
NSC-18	03-18-83	Ann A. Zorn, 1591 Gabriel Dr., LV 89109, representing League of Women Voters (Natural Resources Consultant)	Req. to speak at LV on be- half League of Wom. Voters	<i>marked book 21</i>
NSC-19	"	Judy Treichel, 4491 Balsam St., LV, NV 89108 Phone: 702-645-3035	Request to speak at LV behalf of self	<i>marked book 21</i>
NSC-20	"	Robt. R. Loux, Div. of R&D, DOE, Carson City, NV 89710,400 W. King St., Rm. 106 (Loux at LV & J.I. Barnes at Reno)	Request to make FIRST PRESENTATIONS at both LV & Reno hearings	<i>marked book 21</i>
NSC-21	"	Judy Michelson, 2101 Pine Ridge Drive, Reno, NV 89509	Req. to speak at Reno in behalf of self	<i>marked book 3/21</i>
NSC-22	"	Liz Bernheimer, Univ. of NV School of Medicine, Office of Dean, Reno, NV 89557-0046	Req. to speak at Reno in behalf of self	
NSC-23	"	Maya Miller, 6185 Franktown Road, Carson City, NV 89701	ditto above	
NSC-24	"	James E. Owen, Rancho Amargosa, Rt. 16, Box 518, Amargosa Valley, NV 89020	Speak at LV, representing Amargosa Valley Water Users Assn.	
Insert: NSC-13	(03-16-83)	Ann Zorn, LWV; Paul Bottari, NV Cattlemens Assn; and Judy Treichel, Citizen Alert	Request to speak - Zorn & Treichel LV; Bottari - Reno	per PAW 3/21/83 <i>Sample rate</i>
NSC-27	03-21-83	Kristin Pfanku, 1215 Beech, #22, Reno, NV 89512	Request to speak in Reno behalf of self	<i>marked book</i>
NSC-28	"	Glenn C. Miller, Chairman, Toiyabe Chapter, Sierra Club, P. O. Box 8096, Reno, NV 89507	Request to speak in Reno before noon or after 3:30 p.m.	
NSC-31	"	James E. Owen, Rt. 15, Box 518, Amargosa Valley, NV 89020	Request to speak in Reno late on agenda	<i>marked book</i>

Reynolds Electrical & Engineering Co., Inc.

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Log No.	Date	Received From:	Nature of Inquiry/Request	Action
NSC-76	04/28/83	Jo Anne Garrett, The Rock House Library, P. O. Box 33, Baker, NV 89311	Comments on the selection of the site	Copy to A. Roberts - 04/28/83 copy to PAW for info
NSC-77	"	Rec'd from DOE: Ward L. Mains, Star Rt. Box 6035, Pahrump, NV 89041 (ltr dtd 04/18)	Comments on Yucca Mtn. Site	Rec'd from Allen Roberts as part of pkg
NSC-78	"	Rec'd from DOE: Sierra Club, Toiyabe Chapter, P. O. Box 1977, Las Vegas, NV 89119	7, Preliminary Comments on Site Nomination	ditto above
NSC-79	"	Rec'd from DOE: REECo Employees Form Letter A. N. Rodriguez (no address shown)	Favors Yucca Mtn. as Site	ditto above
NSC-80	"	Rec'd from DOE: REECo Employees' Form Letter Ralph & Pauline Seeliger, Star Rt. 42, Box 2545, LV, NV 89124	ditto	ditto above
NSC-81	"	Rec'd from DOE: REECo Employees' Form Letter Jimmie E. Bean, Box 557, Star Rt 89038, LV, NV 89124	ditto	ditto above
NSC-82	"	Rec'd from DOE: REECo Employees' Form Letter Oliver L. Scarsdale, 6247 Shenandoah Ave., LV, NV 89115	ditto	ditto above
NSC-83	"	Rec'd from DOE: REECo Employees' Form Letter Bernice Moore (no address shown)	ditto	ditto above
NSC-84	"	Rec'd from DOE: REECo Employees' Form Letter Jack Hyatt, 5812 Iris Ave., Las Vegas, NV 89107	ditto	ditto above
NSC-85	"	Rec'd from DOE: REECo Employees' Form Letter Bobby C. Howell, 5171 N. Pioneer Way, LV, NV 89129	ditto	ditto above
NSC-86	"	Rec'd from DOE: REECo Employees' Form Letter A. L. Fox (no address shown)	ditto	ditto above
NSC-87	"	Rec'd from DOE: REECo Employees' Form Letter John R. Bean, 2605 Rialto Road, Las Vegas, NV 89108	ditto	ditto above
NSC-88	"	Rec'd from DOE: REECo Employees' Form Letter Junior I. Conrad (no address shown)	ditto	ditto above
NSC-89	"	Rec'd from DOE: Soroptimist International of Greater Las Vegas Nancy Austin London, P. O. Box 66, Las Vegas, NV 89125		ditto above

Reynolds Electrical & Engineering Co., Inc.

INCOMING CORRESPONDENCE LOG MASTER LOG

Log No.	Date	Received From:	Nature of Inquiry/Request	Action
NSC-57	04/04/83	Herb Gilkey, 2009 Las Flores Las Vegas, NV 89102	Verbal request received at UNLV for summary	Mailed 04/04/83
NSC-58	"	Cynthia Huth, 6224 Katella Las Vegas, NV 89118	ditto	ditto
NSC-59	"	Joan Louise Siegel, P. O. Box 14614 Las Vegas, NV 89114	ditto	ditto
NSC-60	04/05/83	Linda J. Cunegin, 1617 Cordoba Lane, Apartment C Las Vegas, NV 89108	Protests bitterly the selection of Nevada as a site	Copy to DOE (thru PAW)
NSC-61	04/06/83	Harold P. Foster, Chief/Howard A. Null, Chief of Planning, City of Las Vegas, Dept. of Community Planning & Development	Requested copy of Info Document	Mailed 04/06/83
#8 NSC-62	"	Call from Becky Parr, 5303 Stampa Las Vegas, NV 89102	Requested copy of summary be mailed	Mailed 04/06/83
NSC-63	04/06/83	Albert Gold, VP for Finance & Administration, Desert Research Inst., P.O. Box 60220, Reno, NV 89506	ditto	Mailed 04/06/83
NSC-64	"	Rick Hoffman, Act. Chf., EIS Review Section, USEPA, Region IX, 215 Fremont St., San Francisco, CA 94105	Sent comments they wanted entered into record	Copy to DOE 04/07/83
NSC-65	"	Glenn W. Antrim, 2971 Las Casitas Way, Las Vegas NV 89121	States Nevada is not proper location for site	ditto
NSC-66	04/07/83	Gordon W. Smith, 3961 Giles Street, Las Vegas, NV 89119	Approves of NTS as site of "Dump"	Rec'd by DOE - Turned over to PAW 04/04/83
NSC-67	04/11/83	Amy Dansie, Secretary, Nevada Council of Professional Archaeologists (no address shown - Mailed in Carson City)	Renders comments on method DOE is using re hearings	Extra copy to PAW for DOE
NSC-68	04/13/83	Arthur J. Majewski, 48 Bob White Way, Reno, NV 89502	Strongly protests the use of Nevada as a site.	Rec'd from DOE (Allen Roberts) 04/13/83 - he kept copy.
NSC-69	"	Tennys E. Friberg, 1005 Dunbar Drive, Carson City, NV 89701	Protests use of Nevada for "dump" site	ditto above
NSC-70	04/18/83	Mrs. Vladeff, 140 Spear Sparks, NV 89431	Suggests chosen Pres. Reagan's ranch be the site for the repository site	Copy to DOE 04/18/83
NSC-71	"	Larry D. Struve, Director, State of Nevada, Dept. of Commerce, Nye Bldg. Rm 321, 201 S. Fall St., Carson City	Comments on Hearing 89710 (directed to Bob Nelson)	Copy to DOE 04/18/83
NSC-72	04/21/83	Ellen L. Steiner, 12045 Broken Hill Road Reno, NV 89511 (on Citizen Alert form)	Protests choice of site for this purpose	Copy to DOE 04/21 - copy held for PAW
NSC-73	04/25/83	David Berick, Director, Nuclear Waste Project; Environmental Policy Institute, 317 Pennsylvania Ave SE, Wash. DC 20003	Environmental Policy Statement re site	Copy to DOE 04/25 - copy held for PAW
NSC-74	04/26/83	Dr. Thorne J. Butler, 301 Parkway East, Las Vegas, NV 89106	Follow-up Comments on Hearing Committee	Copy to DOE 04/26 - copy held for PAW
NSC-75	"	(Citizen Alert Form) Nicholas L. Klaich, 399 Urban Road, Reno, NV 89509	Brief comment.	Copy to DOE 04/26 - copy held for PAW

Reynolds Electrical & Engineering Co., Inc.

INCOMING CORRESPONDENCE LOG

MASTER LOG

Page 1 of 2
3/28/83

Log No.	Date	Received From:	Nature of Inquiry/Request	Action
NSC-39	03/23/83	Janice D. Whitefeather, P. O. Box 49 Schurz (2) NV 89427	Req. to speak at Reno behal "of grandchildren"	
#1 NSC-40	03/24/83	Clair Haycock, Haycock Distributors, P. O. Box 340 Las Vegas, NV 89125		Request for report, received by phone. Book sent out from REECo Ex. Office
NSC-41	03/25/83	Joseph F. Griggs, Jr., Box 488 Baker, NV 89311	Req. to speak in Reno - self	Cy to Allen Roberts for agenda
NSC-42	03/25/83	Jo Anne Garrett, Box 27, Baker, NV 89311	Req. to speak in Reno-self	Cy to Allen Roberts for agenda
NSC-43	03/25/83	Dr. C. Fred Rogers, 560 Cranleigh Dr., Reno, NV 89512	Req. to speak in Reno - atmospheric aerosol spec.	Cy to Allen Roberts for agenda
NSC-44	03/25/83	Stephen C. Rohn, 2840 Constantine Ave., LV, NV, 89101	Req. to speak in LV-self	Cy to Allen Roberts for agenda
#2 NSC-45	03/28/83	Bob Campbell, Sr. VP, American Nevada Corporation, 2501 N. Green Valley Prkwy, Suite 101, Henderson, NV 89015	Requested copy of summary be mailed (Rec'd by phone)	} Copies mailed 3/28/83
#3 NSC-46	"	Brenda Bland, Tonopah Time, P. O. Box 193 Tonopah, NV 89049	ditto above	
#4 NSC-47	"	Dr. James E. Russell, Texas A&M University Petroleum Engineering Department, College Stn, TX 77843	ditto above	
#5 NSC-48	"	Assemblyman Mike Malone, Nevada Legislature Carson City, NV 89710	ditto above	
NSC-49	03/29/83	Edward J. Bower and Frances Bower, 5912 Halifax Avenue, Las Vegas, NV 89107	They state they "favor" the Nevada location	copy to PAW for DOE
#6 NSC-50	"	Flo Butler, Librarian, Los Alamos Technical Associates, Los Alamos, NM 87544	Requested summary by mail.	Sent out 03/29/83
NSC-51	03/31/83	Dick Duffey, Professor of Nuclear Engineering, University of Maryland, College Park, Maryland 29642	Requested summary by mail	Sent out 04/01/83
#7 NSC 52	04/01/83	Louis Benezet, P.O. Box 150, Pioche, NV 89043	Req'd. be put on mailing list	Summary mailed out 04/01/83
NSC-53	"	Havard Smith, 6308 Dayton Avenue, Las Vegas, NV	Declares selected site as "unacceptable" . . .	Copy to PAW for DOE
NSC-54	---	Edward J. and Frances Bower, 5912 Halifax Avenue, Las Vegas NV 89107	They favor location for choice of site	Copy to PAW for DOE Duplicate
NSC-54	04/04/83	Keith Sargent, 2212 Isabelle Avenue, Las Vegas, NV 89101	Verbal request from UNLV for Summary	Mailed 04/04/83
NSC-55	"	Dennis Brooks, 4000 Vegas Drive Las Vegas, NV 89108	ditto	ditto
NSC-56	"	Maureen Wuruck, 1865 Rexford Las Vegas, NV 89109	ditto	ditto

Reynolds Electrical & Engineering Co., Inc.

INCOMING CORRESPONDENCE LOG

MASTER LOG

Log No.	Date	Received From:	Nature of Inquiry/Request	Action
NSC-20	03-18-83	Robert R. Loux, Div. of R&D, Dept. of Energy, Carson City, NV 89710 (Loux at LV and J. I. Barnes at Reno) (400 W. King Street, Room 106)	Want to make FIRST PRESENTATION at both LV and Reno hearings	
NSC-21	"	Judy Michelson, 2101 Pine Ridge Drive Reno, NV 89509	Req. to speak at Reno in behalf of self	
NSC-22	"	Liz Bernheimer, University of Nevada School of Medicine, Office of Dean, Reno, NV 89557-0046	Req. to speak at Reno in behalf of self	
NSC-23	"	Maya Miller, 6185 Franktown Road, Carson City, NV 89701	ditto above	
NSC-24	"	James E. Owen, Rancho Amargosa, Rt. 16, Box 518, Amargosa Valley, NV 89020	Req. to speak at Las Vegas repres. Amargos A valley Water Users Assn.	
NSC-25	03-21-83	Thomas Heathcote, 2305 Demetrius, Las Vegas, NV 89101 (649-4742)	Request to be notified of Waste Storage Hearings	
NSC-26	"	Jim Buckley, no address given	Request to speak at Reno Hearing	
NSC-27	"	Kristin Pfanku 1215 Beech #22, Reno, NV 89512 (Kristin Pfanku)	Request to speak at Reno Hearing	
NSC-28	"	Glenn C. Miller, Chairman, Toiyabe Chapter, Sierra Club, P. O. Box 8096, Reno, NV 89507	Request to speak before noon or after 3:30 pm at Reno	List 5
NSC-29	"	John D. Parkyn, LACBWR Supt., Dairyland Power Cooperative P.O.Box 817, 2615 East Ave.South, Las Cross Wiscon. 54601	STRONGLY SUPPORTS SELECTION OF NTS Site	List 16
NSC-30	"	James E. Owen, Rt. 15, Box 518, Amargosa Valley, NV 89020 Marked for Chris West	Two identical letters - one	sent to Chris West
NSC-31	"	ditto above	ditto above	
NSC-32	"	Peggy Twedt, 500 W. Telegraph, Carson City, NV 89701	Speak at Reno behalf of League of Women Voters	
NSC-33	"	Leonore Haimowitz, 2601 Solari Drive, Reno, NV 78598	Speak at Reno on her own behalf.	
NSC-34	"	Susan Orr, 3585 Ormsby Lane, Carson City, NV 89701	Request to speak at Reno between 12 - 1 PM or 3 - 3:30 pm behalf Citizen Alert	
NSC-35	"	Jon Vigoren, 5860 Home Gardens, Reno, NV (received in Susan Orr envelope)	Requests time to speak at Reno in own behalf	
NSC-36	03-22-83	Theodore E. Oleson, Jr., 305 W. 4th Avenue, Sparks, NV 89431	Req. to speak at Reno after 1 p.m. behalf of self	
NSC-37	"	Dagmar Thorpe, 35 Reservation Road Reno, NV 89502	Req. to speak at Reno behalf Native Nevadans for Political Education & Action	
NSC-38	03-23-83	John H. Emerson, 556 Marsh Ave., Reno, NV 89509	Req. to speak at Reno behalf Citizen Alert	

Reynolds Electrical & Engineering Co., Inc.

INCOMING CORRESPONDENCE LOG

MASTER LOG

Log No.	Date	Received From:	Nature of Inquiry/Request	Action
NSC-1	03-04-83	John B. Walker, State of Nevada State Office of Community Services, Carson City	Request to remain on mailing list	Added to list - 03/08/83
NSC-2	03-09-83	Soroptimist International of Greater LV Lois Sagel, 2009 Wengert, LV, NV 89104	Requested info on Nuclear Waste	" " - 03/09/83
NSC-3	"	Teri Goth 2375 E. Callahan, LV 89119	Request for info on hearing and "deadline date"	" " "
NSC-4	03-10-83	(Thru DOE - Sierra Club)Cheri Cinkoske, Martin Einert, Julie Christensen & A. J. Stevens	Request to remain on mailing list	To MTST for addition to list 03/10/83
NSC-5	"	John Schilling, Director, UNR, Nev. Bureau of Mines & Geology, Reno, NV (State Geologist)	Request to be placed on Notification List of Hearings	Filed - Already on List #2
NSC-6	03-14-83	Robin Jenkins, M.A., 4494 El Cebra, Las Vegas NV 89121	Strong protest against all dumps and testing	
NSC-7	"	Larry D. Struve, NV Dept. of Commerce, 201 S. Fall St., Carson City, NV 89710	Put on Notification List plus info on Reno hearing	Already on list.
NSC-8	"	Katherine Gardiner Hale, 1101 Keystone Ave., Reno, NV 89503	Requests time to speak at Reno hearing (a.m. session)	Put on List #1 - 03/14/83
NSC-9	"	J. F. Robinson, 710 Robin St., Reno, NV 89509	Requests time to speak at Reno & info (outline) req'd.	Put on List #1 - 03/14/83
NSC-10	03-15-83	Abby Johnson, Citizen Alert, P.O. Box 5391, Reno 89513 Alt. address: P.O.Box 1681, LV 89101	Requests time to speak at Reno, early afternoon	Put on List #5 - 03/15/83
NSC-11	"	S. Everett Perlberg, Chairman of Board, American Warehousing, Inc., P.O.Box 4364, NLV, NV 89030	Expresses vote of confidence in project	Copy of ltr to DOE thru PAW
NSC-12	03-16-83	Steve Bloomfield, M.D., 373 W. Arroyo, Reno 89509 (representing Citizens Alert & Physician for Spec. Respons.)	Requests to speak at Reno hearing	Already on list, per PAW
NSC-13	03-16-83	List of ten (10) names rec'd from A. Roberts, DOE/NV, (See back of this sheet for names involved)	Requests names be added to mailing list	See reverse side for action
NSC-14	03-17-83	Sym O. Morris, 14090 Tourmaline Dr., Reno, NV 89511	Requests time to speak at Reno, behalf of N.A.A.V.	
NSC-15	"	Cynthia K. Mitchell, 1011 Washington, Reno, NV 89503	Time to speak at Reno, behalf of self	
NSC-16	"	Joseph H. Robertson, 920 Evans Avenue, Reno, NV 89512	Time to speak at Reno, behalf of Citizens Alert	
NSC-17	"	Bill Vincent, Southern Coordinator, Citizen Alert, P. O. Box 1681, LV, NV 89101	Request for Citizens Alert to speak in Las Vegas	
NSC-18	03-18-83	Ann A. Zorn, 1591 Gabriel Dr., LV, NV 89109, representing League of Women Voters (Natural Resources Consultant)	Request to speak at LV behalf League of WV	
NSC-19	"	Judy Treichel, 4491 Balsam St., LV., NV 89108, Phone: 702-645-3035	Request to speak at LV behalf of herself	

NOTES:
NSC-13

- Breakdown of names & addresses applicable to this entry: Peggy Twedt, League of Women Voters, 500 W. Telegraph, Carson City, NV 89701; Ann Zorn, League of Women Voters, 1591 Gabriel Drive, LV, NV 89109; Glenn Miller, Pres., Toiyabe Chapter Sierra Club, 1850 Prior Rd., Reno, NV 89503; Barry Crain, Advocates for Future Generations, 245 Gentry Way, Reno, NV 89502; Liz Bernheimer, Health Professionals for Nuclear Awareness, 1401 Earl Drive, Reno, NV 89503; Bob Fulkerson, Chairman, Progressive Student Alliance, 215 E. 7th St, #6, Reno, NV 89501; Larry Fleming (private citizen) 401 College Dri., #105, Reno, NV 89503; Paul Bottari, Nevada Cattlemen's Assoc., 419 Railroad, Elko, NV 89801; Judy Treichel (new Citizen Alert Bd. Member), 4491 Balsam, LV, NV 89108; Don Springmeyer (new CA Bd. Member) 6028 C. Plumas, Reno, NV 89509

Action: 3/21/83 per PAW: Books mailed to Twedt (#5); G. Miller (#5); L. Bernheimer (#5); L. Fleming #1; & Springmeyer (#22); Zorn, Bottari, Treichel have requested time to speak, per PAW.

Soroptimist

INTERNATIONAL OF GREATER LAS VEGAS

P. O. Box 66
Las Vegas, NV 89125
April 21, 1983

NAME	INITIALS	DATE
FILE		

U.S. Department of Energy
Public Hearings on Nevada Site Characterization
ATTN: Presentation Schedule, Mail Stop 550
P. O. Box 14100
Las Vegas, NV 89114

Gentlemen:

Although our club has no formal position on the establishment of a high level radioactive waste repository at the Yucca Mountain site in Nevada, we are interested and concerned that the best possible evaluation of the site be made in the interest of public health and welfare.

One issue we wish to see addressed in the Site Characterization Plan is that of transportation of the waste. Yucca Mountain is near Highway 95, the main north-south roadway between the two major population centers of Nevada and the lifeline for many smaller communities between them. Over what routes, by what modes of transportation, and with what frequency (predicted for various future times) will the waste be transported? What will be the impact on public health and welfare of the worst credible transportation accident involving this waste? What will be the impact on our major industry -- tourism -- of even a minor transportation accident and the attendant publicity that can be expected? Is cleanup possible, and to what extent is it possible, if radioactive waste should be released from its containers in an accident? Will radiation exposure to residents or travelers cause health effects in the exposed persons or in future generations, as we have heard that it will?

We urge that you provide early and easy access to all information developed in the Site Characterization study and that the information be provided to the public in language it can understand. We also encourage you to include objective data on both advantages and disadvantages of the proposed site. We further encourage you to make objective scientists available to the citizens of Nevada to provide information and respond to questions in forums that are quite different from the usual public hearing where concerns and questions are expressed but not answered.

Please keep us informed and continue to allow us the opportunity to be involved in the decision making process regarding the selection of a Nevada site for a high level radioactive waste repository.

Sincerely,

Nancy Austin London
President

ACTION LS MPO
 INFO APD
 R. F. _____
 AMA _____
 AM & C _____
 AID _____

P.O. Box 66 Las Vegas, Nevada 89125 MC 39

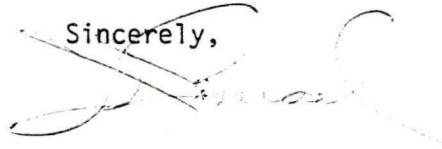
OPA

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECo (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Small", written over a horizontal line.

NSC-88

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECo (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,

John R. Bean
2605 Rialto Rd.
Las Vegas, Nevada

NSC-87

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECO (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. L. Jay".

DEPT. of ENERGY
P.O. Box 14100
L.V. No. 89114

NSC-86

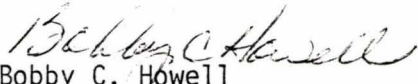
OPH

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECo (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,


Bobby C. Howell

NSC-85

~~011~~
OPA

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECo (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,

Jack A. Smith

NSE-84

OPA

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECo (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,

Dunnie Moore

NSC-83

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECo (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,

Oliver L. Scardale

NSC-82

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECo (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,

James E. Bean

NSC-81

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECo (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,

Ralph Seeliger
Pauline Seeliger

NSC-80

April 13, 1983

To the Department of Energy Nevada Operations Office (DOE/NV):

I am an employee of REECo (Reynolds Electrical and Engineering Co., Inc.) and work at the Nevada Test Site. I would like to see Yucca Mountain be appointed the site for the proposed high-level radioactive waste repository. Many advantages can be obtained by having it located on the Nevada Test Site; the economy will be improved by providing more jobs.

Sincerely,

A. M. Rodriguez

NSC-79



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

NAME	PHONE	ADDRESS	MEMBERSHIP
✓		WEST	
		KENDRICK	
		MELANCON	
		RICHARDS	
		SECRETARY	
EE			

PRELIMINARY COMMENTS
 on the proposed nomination
 of
 Yucca Mountain
 as a potential high-level
 radioactive waste repository

April 25, 1983

Submitted by: Jeff van Ee, Chairman - Las Vegas Group

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NSC-78

The Sierra Club is a national environmental organization with over 325,000 members. The Club is broken into statewide and local units. The Toiyabe Chapter of the Sierra Club represents Sierra Club members within Nevada. The Las Vegas Group represents Sierra Club members within the Southern Nevada area--an area that is being considered for the storage of high-level nuclear wastes.

Comments for consideration in the Department of Energy's Environmental Assessment process for the Nevada Test Site as a possible storage site have been provided by the Toiyabe Chapter. Additional comments are being provided by the Las Vegas Group to ensure that the interests and concerns of Southern Nevada environmentalists are taken into consideration in the DOE's decision-making process.

The national Sierra Club has expressed concerns and reservations to the Congress and to the DOE on the overall framework for the selection process for a high-level nuclear waste repository. The Las Vegas Group is concerned with the same issues that were raised in earlier Sierra Club comments and testimony by the national office as well as other regional chapters and groups; however, the Las Vegas Group does not intend to duplicate these concerns or comments at this time in the discussion of the Environmental Assessment for the Nevada Test Site potential repository.

The Las Vegas Group is concerned with the significant long-term, national problem of how this nation will store nuclear wastes that have been created by the nuclear power and weapons industry. The problem is not a simple one, and it will not disappear if it is ignored. If the problem is not adequately addressed now, the problem will only continue to get worse. The Las Vegas Group believes that its comments on the Environmental Assessment process represent the beginning of an educational process for the DOE as well as public citizens on this most significant issue. The comments presented should not be considered as the "final word" or as the "gospel". The intent is to provide a sampling of concerns that bear investigation and answers in the DOE's Environmental Assessment and Environmental Impact Statement process.

While members of the Sierra Club have concerns about the technical, environmental, economic, and political aspects associated with the way in which the wastes area created, the Las Vegas Group will restrict its comments to the narrow issue of how one deals with nuclear waste once it has been created. It is unfortunate that the answer to this significant question was not thoroughly investigated prior to the decisions that have been made in the past to create the waste; however, the waste is here and now and it must be disposed of in the best way that man can devise.

While members of the Las Vegas Group are often concerned about the future impacts of man's activities on the environment, few issues have such long-reaching implications as the storage of high-level nuclear waste. Members need only look at how we have dealt with other difficult problems such as the storage of hazardous chemical wastes to realize that there are no easy solutions. All too often we find that issues that were safely put to rest some years ago only surface at a later date to cause concern and actual harm to man and his environment, e.g., Love Canal. These problems have surfaced within the recent past. The toxicity of high-level nuclear waste will remain with us for thousands of years. Members of the Club, indeed the public, is not used to dealing with problems on this time-scale.

The decline of great civilizations in the past and the monuments that they left behind (the Pyramids in Egypt and the Aztec ruins in Mexico) make one wonder what will become of the nuclear wastes and the repositories that we create today. While many of our concerns can be viewed as being short-term because they basically cover the approximate seventy year period that any of us will be alive, we owe it to future generations to consider the really long-term consequences of our actions that we take today. Obviously, this challenge is not an easy one for any of us to meet whether it is considered within the Sierra Club, or by the DOE in their Environmental Assessment process.

The general, broad comments given thus far should set the framework for more detailed comments that follow.

The primary emphasis in the storage of nuclear wastes should be on the long-term storage and containment of those wastes in the geological and man-made environments. This has been recognized, and it should continue to be recognized in the Environmental Assessment for the potential Nevada Test Site location.

The Environmental Assessment should provide for the public a summary of how the Nevada Test Site was selected. This summary must cover what is known as well as what is not known about the volcanic tuff formation. The summary should also place into a larger perspective why this particular geological formation was selected from a variety of geological and geographical alternatives. (National Sierra Club comments have expressed concern with the evaluation criteria and the administrative processes used by the DOE in focusing on the Nevada Test Site as well as on several other select sites.)

A number of issues which require investigation and elaboration come to mind. An estimate, or statement of the "confidence limits" needs to be included for each of the following issues:

- 1) The long-term climatic outlook - Significant meteorological changes have occurred in the past as demonstrated by geological evidence as well as by historical evidence. It should be recognized that an eye toward the past is not necessarily

a firm indicator of the future.

2) The geological framework - Seismic, volcanic, and tectonic activity should be assessed.

3) The technological approach - The method for stabilization, containment, and storage of the waste should be described so that its suitability to the geological setting can be assessed. A statement of the risks, or of the unknowns should be included. For example, the premature aging of metals in nuclear reactor heat-exchangers and vessels was not known until after many reactors had been in operation for some time. What are the chances of this type of problem developing at the Nevada Test Site repository? How will it be monitored? How will it be corrected, or will it be corrected at all - instead relying on the geological setting to isolate the wastes?

The popular press has reported a possible nuclear explosion of some type from a storage facility in the Soviet Union. A theory has been advanced that the wastes may have leaked and interacted with the natural geological setting to create a harmful release of radioactivity to the environment. This example, and the questions and examples provided above, simply illustrate the point that the public needs to know what the risks are in the storage of nuclear wastes at a particular site.

4) The economic aspects - The impact of the repository on the state and local governments needs to be examined. Again, the benefits to the local economy need to be stated along with the costs. Who will pay for policing of the shipments to the site? Who will pay for accidents that may occur in the shipment of the wastes along our highways, or railroads? Who will pay for the maintenance of those transportation routes? How long will the wastes be stored? How much will be stored? How many shipments will be made during the year, and how will the wastes actually be transported from state to state until it reaches the final destination?

5) The transportation issue - Questions in this area have already been stated. Other than the impacts associated with the actual construction and operation of the repository, this issue has the most potential for affecting people's lives. The impact of a train derailment, or a highway accident can be immediate on someone. While the containers may prevent radioactivity from being released to the environment, what are the chances? What will the consequences be to our highways, railroad beds, and to our automobiles on the highways from the heavy containment vessels that will be transported from all across the nation to the Nevada Test Site. The public need only look at some of the incidents involving the Beatty waste site, and they have to wonder if things will be better or safer with the transport of high-level nuclear wastes through their cities and country-side. The transportation issue needs to be explored in depth. It cannot be separated from the siting issue.

The political environment - Just as the storage of high-level nuclear waste requires a stable geological setting, it is important to have a stable, well-structured political environment for the waste repository. The Environmental Assessment process begun by the DOE represents the first step in the process of involving the public in the decision-making process. The success of the DOE in handling the large, complex process in storing nuclear wastes will depend on how successfully they follow the mandates from Congress and on how well they involve the public. The Governor of Nevada has stated his opposition to Nevada being considered as a possible storage site. While provisions exist in the enabling legislation for this type of input to the DOE selection process, what priority will be given to this type of public expression especially if it is backed by well-founded questions and criticisms? How will the concerns of Nevadans be handled now or at a future date? Will the DOE, NRC, or the Congress have the final word, or will the sentiments of the local population prevail?

What steps will be taken to ensure that nuclear waste shipments to the proposed Nevada Test Site are not highjacked? The shipment of wastes from all over the nation to a central repository will require stable and secure routes.

SUMMARY:

Nuclear wastes are increasing at existing nuclear power plants and weapons facilities throughout the nation. The ability of those facilities to safely store and handle those wastes is becoming increasingly difficult. Releases of wastes to the environment at the Hanford, Washington and Savannah, Georgia facilities indicate the need for positive steps to be taken as soon as possible to safely store those wastes. The Las Vegas Group of the Sierra Club recognizes that the process is a difficult one and complex. Consequently, the comments provided by the Group at this point are general in nature. Questions have been raised which require answers. An interchange of information needs to occur between the DOE, the scientific community and the public. The Las Vegas Group will await the release of the Environmental Assessment before more specific comments and questions will be forthcoming. It should be obvious that the more the DOE can involve the public in its decision-making process, and the more complete the Environmental Assessment, the more productive future discussions of Yucca Mountain as a possible repository will be. The Las Vegas Group will cooperate with the DOE, as best as it can, in the decision-making process before it makes the decision whether Nevada is the only place where the present nuclear wastes can be stored for the benefit of the nation and future generations.

4-18-1983

D.O.E./NV.

Your April 8, 1983 N.T.S. News Bulletin said we as citizens may comment on Yucca Mountain repository. I have worked for Reeco going on 5 years. I am for it.

1. I worked at shaft 15 for 11 months. It turned out successful.
2. I run cranes in area #3 now. We have hundreds of craters with high level waste in them. The water well in area #3 is 2,000 feet. There has been no waste in it.
3. The land is no good for any thing now. It could never be turned back to the public if the test site was to shut down tomorrow. Where could be a better place for the waste than Yucca as long as the area is suitable.
4. I also think low waste should be put out at the test site, the way the counties & states fight back and forth. They can never manage any site on there own. If D.O.E. was doing it. It would be done right.
5. I live around 40 miles from Yucca. I feel I am ~~safe~~ safer here with D.O.E. looking over things. Than living by any gasoline storage.

Thank you,

Ward S. Main
Star Rt. Box 6035
Pahrump, Nev.
89041

NSC-77

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March 31, 1983

Note:
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4/26/83

U. S. D. O. E.

Public Hearing on Nevada Site Characterization

Mail Stop 555, Box 14400

Las Vegas, Nevada 89114

Gentlemen:

Your study of Yucca Mountain as a high level radioactive waste repository needs to emphasize:

- 1) Its proximity to continuing nuclear testing.
- 2) Transportation hazards owing to the inordinate distance between Yucca Mountain and the sources of high level radioactive waste.
- 3) The damage to Nevada's environment and economy that is sure to result from further degradation of land and water by radioactive materials.
- 4) The disregard for the civil rights of rural people that is inherent in the preference for sparsely populated areas for waste dump sites.
- 5) The impossibility of accurately gauging or predicting groundwater migration in the Great Basin.
- 6) The fact that radioactive waste disposal is part of the cost of generating nuclear power; therefore, why should Nevadans assume this burden and thereby subsidize out-of-state industries?

Sincerely yours,

Jo Anne Garrett

NSC-76

TO: UNITED STATES DEPARTMENT OF ENERGY

DATE April 20, 1983

I AM UNABLE TO ATTEND THE HEARINGS ON MARCH 30 & 31. HOWEVER, I AM DEEPLY CONCERNED ABOUT HOW A HIGH-LEVEL RADIOACTIVE WASTE DISPOSAL SITE WILL AFFECT NEVADA AND NEVADANS. SOME OF MY CONCERNS ARE:

HASGOT Nevada done its share with
The dump at Beatty?

USDOE IS ACCEPTING COMMENTS UNTIL APRIL 25. Signed

Send this sheet to USDOE, NV SITE
CHARACTERIZATION, MAIL STOP 555,
BOX 14400, LAS VEGAS, NV 89114

or

Nicholas L. Klaich
Name NICHOLAS L KLAICH
Address 399 URBAN Rd
City/zip RENO 89509

Send to nearest Citizen Alert office.

We will try to present your concerns at the hearing, and we will submit this to DOE.

BOX 5391, Reno NV 89513 or BOX 1681, Las Vegas, NV 89101

NSC - 75

THORNE J. BUTLER, M.D.
4230 SOUTH BURNHAM AVENUE - SUITE 201
POST OFFICE BOX 14220
LAS VEGAS, NEVADA 89114

April 25, 1983

United States Department of Energy
Environmental Assessment for Nevada Site Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, Nevada 89114

Hearing Committee on High Level Nuclear Waste

My name is Thorne J. Butler residing at 301 Parkway East, Las Vegas, Nevada 89106. I am submitting these comments to this hearing taking testimony on the consideration for storage of high level waste nuclear materials at the Nevada Test Site for two reasons. The first, having served for almost fourteen years on the Nevada State Board of Health and the Nevada State Environmental Commission as chairman, vice-chairman of both organizations I believe I have had extensive experience with environmental problems facing Nevada. In particular these bodies were involved in developing regulations when Nevada became an agreement State under the Nuclear Regulatory Commission and further has been responsible for almost two decades in the regulatory control of the low waste nuclear disposal site at Beatty, Nevada. Second, I believe that the major sources of fuel for generating electricity in the United States are coal and nuclear.

While coal is in abundance in the lower 48 states its combustion creates major environmental problems. Currently, there is intense investigation and discussion over the problems of acid rain which are contaminating and apparently affecting fresh water lakes in Canada and the Northeastern United States. I believe most now agree that extensive scrubbing for both SO_x and NO_x are necessary to minimize this environmental impact. From a biological and public health point of view, particulate materials released from the burning of coal contain not only pulmonary irritants but also radium and radon daughters which are carcinogenic. The removal of particulates is a complex and technically difficult problem. The experience in Nevada with coal burning power plants at Moapa and Southpoint continually demonstrate the difficulties and high cost of both gas scrubbing and particulate removal.

Nuclear generation of electricity has become increasingly costly for many legitimate reasons. However, coal generation is equally

NSC-74

costly when the requirements for scrubbing for SO_x and NO_x and particulate removal are added to capitalization and operation costs. In many ways the environmental impacts of nuclear generation are substantially less than that of coal generation. The major problem associated with nuclear generation is management of waste materials in the fuel cycle, which requires the storage of used reactor rods over a long period of time. That storage is necessary not only to protect the environment, particularly the biological environment from exposure, but also as a repository for eventual recovery of plutonium in those rods for future fuel use.

Such a storage area needs to be isolated, easily protected from human intrusion, in a geologically stable region, and separated from local hydrology. An additional requirement is the ready availability of an experienced and trained labor force capable of handling and storing such materials in an appropriate repository. It would appear from all studies many of which are extensive and in depth indicate that the Nevada Test Site fulfills all of those requirements.

Can such a site be operated safely? It has been my experience in reviewing data generated at the low level Beatty site that there has never been any contamination of the environment outside of that site. Except for one truck driver who was minimally exposed at a rate of 2.5 millirem/hr for a total dose between 60-100 millirem there are no documented cases of human exposure. In the above case, it is worth noting that if the driver was classified as a radiation worker, there would have been no cases of human exposure. In spite of the hoopla about the Beatty site and some real administrative and technical problems, the preponderance of the evidence indicates that such sites can be operated and maintained with safety and no exposure beyond the facility.

I would like to make a strong recommendation that would better insure the proper and acceptable operation of any and all sites selected as a repository for both low-level and high level nuclear waste materials. The current system, in my opinion, is too complex. There is too much duplication and requires so much input by regulatory agencies that no one really has control over nuclear materials starting from the generator, handling of packaging and shipping, and the final disposition for storage. For example, at the commercial low waste site at Beatty, Nevada, 25-30 separate forms are necessary from different regulatory agencies before the burial and storage of one cubic foot of material. At the Incline Village Seminar sponsored by the State of Nevada in Feb. 1980, a consensus of participants indicates that a national regulatory system totally responsible for the handling of nuclear waste materials would assure the kind of control necessary to safely handle and maintain these materials to prevent environmental contamination and human exposure. With high-level materials such an agency seems paramount not only

for control but also to prevent diversion out of the fuel cycle.

Appreciating the political battle that will insue with the development of such a master agency, I think there is strong evidence that not one state or local government body is capable of managing all stages of the problem. By insisting on initial participation in development of policies and regulations by all concerned individuals and groups, hopefully a concensus mechanism would result in creating a national regulatory agency. The governing body would be made up of commissioners with rotating terms and who might be approved by the Senate. Regulations and policies would be subject to periodic public review and comment. This management agency would be separate from the NRC. In essence for appropriate control of nuclear materials you need an almost dictatorial or socialistic management system.

In conclusion, I shall summarize my comments in the following:

- a) Nuclear materials now and will continue to serve our industrial and scientific society with useful tools and energy.
- b) High-level waste materials generated from the energy generating industry must be properly managed to assure protection of environment and public, avoid diversion of highly toxic or fissionable materials, and be available for recovery of isotopes necessary for future energy generation.

NOTE: If we were by policy to change to the thorium cycle, which is elegant but less efficient in producing usable energy isotopes by-products, then the problems associated with plutonium waste would be markedly reduced.

- c) Sites such as the Nevada Test Site possessing with adequate characteristics as isolation, stable geology, protected hydrology, and a knowledgable work force can handle the storage problem to prevent long term human intrusion and environmental contamination.
- d) A national system with total responsibility for management of nuclear waste materials would assure better control and safety.

Respectively submitted,

Thorne J. Butler M.D.
301 Parkway East
Las Vegas, NV., 89106

TJB/ak

Environmental Policy Institute

317 Pennsylvania Ave. S.E. Washington, D.C. 20003
202/544-2600

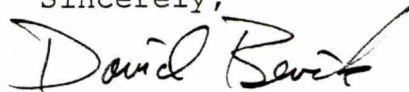
April 22, 1983

U.S. Department of Energy
Public Hearings on Nevada Test Site
Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, Nevada 89114

Dear Sir,

Enclosed are comments by the Environmental Policy Institute concerning the proposed nomination of the Nevada Test Site for characterization for a geologic repository pursuant to the Nuclear Waste Policy Act of 1982 in response to the Department's notice in the Federal Register (48 FR 9578, March 7, 1983 and 48 FR 15323, April 8, 1983).

Sincerely,



David Berick
Director, Nuclear Waste Project

Attachment: EPI comments on proposed site selection guidelines

NSC-73

Environmental Policy Institute

317 Pennsylvania Ave. S.E. Washington, D.C. 20003

202/544-2600

April 22, 1983

Comments of the Environmental Policy Institute
in the Matter of:

The Department of Energy's Proposed
Nomination of a Site Within the
State of Nevada for Characterization
Studies and Issues to be Addressed
in the Environmental Assessment and
Site Characterization Plan (48 FR
9578, March 7, 1983 and 48 FR 15323,
April 8, 1983)

Introduction

On March 7, 1983, the Department of Energy published a notice in the Federal Register (48 FR 9578) requesting comments on the proposed nomination of a site in the State of Nevada for site characterization under the Nuclear Waste Policy Act of 1982 (NWPAA, P.L. 97-425). The notice requested comments on the proposed nomination, on issues to be addressed in an Environmental Assessment (EA) to accompany the nomination, and on issues to be addressed in a Site Characterization Plan if the site is chosen for characterization.

The Environmental Policy Institute has reviewed and commented upon the Department's proposed site selection guidelines (48 FR 5670, February 7, 1983) which are to constitute the basis for nomination of sites for characterization under Sec. 112 of the NWPAA including the Nevada site. The site selection guidelines are also required for specific evaluations to be contained in the EA pursuant to Sec. 112(b) of the NWPAA. The Institute, and other commenters, have identified major flaws in the proposed guidelines which may effect the ability of the Department to nominate the proposed site in Nevada and to complete the EA. A copy of the Institute's own comments concerning the inadequacy of the proposed site selection guidelines is included here.

The Institute finds that the Department should withhold the proposed nomination and preparation of the EA until the Department's site selection guidelines are issued in final form and that issues raised in this notice be readdressed at that time.

Role of Site Selection Guidelines

Sec. 112(b)(1)(A) of the Nuclear Waste Policy Act states that; "Following the issuance of guidelines under subsection(a) and consultation with the Governors of affected States, the Secretary shall nominate at least 5 sites that he determines suitable for site characterization for selection of the first repository site." The Act and the legislative history is clear on the point that nomination is to follow promulgation of the site selection guidelines.

Sec. 112(b)(1)(E) of the NWPA also requires the incorporation of site selection guidelines in an Environmental Assessment(EA)to accompany the nomination. The EA must include two specific evaluations of the proposed site in light of the site selection guidelines.

Since the site selection guidelines are not in final form, the site cannot be nominated nor can the issue the content of the EA be adequately addressed. The Environmental Policy Institute and other commenters have identified major flaws with the proposed guidelines which, in our view, render them entirely inadequate and inconsistent with the NWPA. As such, the proposed guidelines do not constitute an appropriate legal nor substantive basis for site nomination or consideration of "scoping" the Environmental Assessment.

We conclude that the issues raised by the Department in the Notice(48 FR 9578) must be revisited and comments must be resolicited upon final promulgation of the site selection guidelines.

Other Assessment Scoping Issues

The Environmental Policy Institute has also reviewed and commented upon the Department's draft environmental assessment for the characterization of the Hanford, Washington site(DOE/EA-0210, February, 1983). The Institute found this assessment entirely inadequate and inconsistent with the requirements of the NWPA. The Hanford assessment should not serve as a model for other such assessments including the assessment for the Nevada site if it is nominated.

One of the more obvious problems with the Hanford assessment, which should be noted here, is that the Department appears to have utilized a procedure similar to that employed for "environmental assessments" prepared pursuant to the Department's National Environmental Policy Act(NEPA) regulations. The assessment required by the NWPA should not be construed as an environmental assessment pursuant to NEPA and is specifically insulated by the Waste Policy Act from the environmental impact statement process(Sec. 112(e)).

EPI comments--3

The limitation on NEPA review under Sec. 102(2)(C), Sec. 102(2)(E) and Sec. 102(2)(F) of NEPA should not be construed, however, as a limitation on the completeness or thoroughness of the Environmental Assessment required by the Nuclear Waste Policy Act(Sec. 112(b)).

The report of the House Interior Committee on this issue states:

"The Committee intends that throughout the repository development program, the Secretary and other agencies meet the general requirements and spirit of NEPA. Where the Committee has specified that an environmental impact statement under NEPA is not required, the amendment nonetheless provides for the gathering and public consideration of relevant information and for use of informal hearings to provide educational and participatory opportunity.

The specificity of the NEPA guidelines in the committee amendment are intended to avoid litigation regarding its applicability and to ensure that the essential objectives of NEPA are met without such litigation. In some cases, the Committee's recommendation assures that information will be prepared and made publicly available, and that non-Federal governments and the public will have strong roles in decision-making, in cases where NEPA could not have been relied upon to produce these results."

(Interior Committee Report
No. 97-491, Part 1, April 27,
1982; p. 48)

The report of the House Energy & Commerce Committee stated, on this, issue the following:

"Although an environmental impact statement on a repository location is not required until the Secretary makes the recommendation to the President, the NEPA process(except as modified by this bill)applies throughout the repository development program. In particular, Section 102(2)(G) of that Act provides information requirements complementary to those contained in H.R. 6598....

...Information requirements contained in H.R. 6598 are in addition to those contained in any other Act of Congress."

(Energy & Commerce Committee
Report No. 97-785 , Part I,
August 20, 1982; p. 35)

The Energy & Commerce Committee also observed that:

"Although specific sections of NEPA are suspended at specific points in the repository development program, the spirit and intent of the evaluation process established by NEPA applies throughout the program, culminating in the issuance of an EIS."

(Energy & Commerce Committee Report No. 97-785, Part I; p. 37)

Finally, we note that the environmental assessment required by the Nuclear Waste Policy Act in Sec. 112(b) "...shall be considered a final agency action subject to judicial review in accordance with the provisions of Chapter 7 of Title 5, United States Code and section 119." (see Sec. 112(b)(1)(F) of the NWPA) The requirement, therefore, for the adequacy of the proposed environmental assessment may equal or exceed that required of an environmental impact statement prepared pursuant to NEPA. It is most certainly not akin to an environmental assessment prepared under NEPA.

The Environmental Policy Institute believes that there are several specific issues which must be addressed in any environmental assessment for the Nevada Site. These are:

- 1) Defense Waste Management--On Friday, April 1, 1983, the Department of Energy published a notice in the Federal Register (48 FR 14029) stating its intention to prepare an environmental impact statement for the management and disposal of certain defense program wastes at the Hanford Reservation. The notice states that the primary option is to emplace certain high-level wastes in a NWTS waste repository. In addition, DOE is in the process of preparing a study on the management of defense waste required by the FY '83 DOE defense programs authorization. The President must also make certain determinations concerning defense waste management under Sec. 8 of the Nuclear Waste Policy Act regarding emplacement of defense program wastes in NWTS repositories developed under the Act. Since high-level defense waste emplacement in the proposed repository is highly probable, this consideration must be addressed.
- 2) Impact of Adjacent Nevada Test Site Activities--The proposed site in the State of Nevada is immediately adjacent to DOE's nuclear weapons testing center. Any assessment of the location of a proposed repository at the Nevada site should consider the seismic impact of weapons testing activities, past, current, and future, on the integrity of the proposed repository. The assessment must also consider the consequences of radioactive contamination of the repository site from weapons test venting; an occasional but potentially significant event.

- 3) Description of Site Characterization Activities--Any assessment of the Nevada site should contain a detailed description of the intended site characterization activities consistent with the definition of site characterization contained in Sec. 2(21) of the Nuclear Waste Policy Act. In particular, the assessment should differentiate between activities to be carried out at the reference repository location and those expected to be carried out at other locations including the Climax Test Facility, located at the the Nevada Test Site (NTS), or other waste-related NTS activities.

Site Characterization Plan

The Environmental Policy Institute has reviewed the Department's Site Characterization Report for the Hanford site and the Nuclear Regulatory Commission staff evaluation of that report (NUREG-0960, March 1983). The NRC evaluation was extremely critical of the Department's site characterization report with regard to its adequacy and analysis in numerous respects. Several problems are apparent in the Hanford characterization report and may be endemic to the Department's methodology for preparation of such reports. In this context, the Institute believes that the Department must develop more detailed information about the geology, hydrology, seismic characteristics, etcetera, in order to support and justify its site characterization plans. The Nuclear Regulatory Commission evaluation was very specific in its criticism of DOE's failure to have sufficient information about the Hanford site to support its conclusions.

As stated in the introduction to these comments, it is difficult to address potential site characterization plan issues for a site that has not been nominated yet. In light of the criticism DOE has received concerning the Hanford characterization report and in view of the premature nature of comments on characterization plan issues in advance of nomination, the Institute believes that the Department should resolicit comment on site characterization plan issues once the site is nominated.

Environmental Policy Institute

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202/544-2600

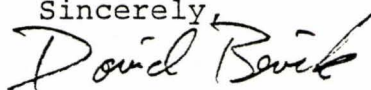
April 6, 1983

Mr. Robert L. Morgan
Project Director
Office of Civilian Radioactive Waste
U.S. Department of Energy
Washington, D.C. 20585

Dear Mr. Morgan,

Attached are the Environmental Policy Institute's comments concerning the Department's Proposed General Guidelines for Recommendation of Sites for Nuclear Waste Repositories as noticed in the Federal Register on February 7, 1983(48 FR 5670).

Sincerely,



David Berick

Director, Nuclear Waste Project

April 6, 1983

Comments of the Environmental Policy Institute
in the Matter of:

Department of Energy Proposed Guidelines--
10 CFR Part 960 "Nuclear Waste Policy Act
of 1982; Proposed General Guidelines for
Recommendations of Sites for Nuclear Waste
Repositories" (48 FR 5670, February 7, 1983)

Introduction

As stated in testimony before the Department of Energy (DOE) hearing panel on this matter on March 10, 1983 in Washington, D.C., the Environmental Policy Institute finds that the proposed guidelines do not reflect the letter or the intent of the Nuclear Waste Policy Act of 1982 (P.L. 97-425) (the Act) and are substantively inadequate.

First, the proposed guidelines are based upon proposed Environmental Protection Agency (EPA) standards which are defective and do not adequately protect the public health, safety, and the environment. The "System guidelines" proposed by the Department and dependent on the EPA standards are thereby inadequate.

Secondly, the DOE has not established a methodology for evaluating individual sites or classes of sites in light of its "system guidelines". No guidance is given as to how the "technical guidelines" are to be weighed or evaluated so as to determine compliance with the "system guidelines".

Thirdly, the proposed "Program guidelines" do not accurately reflect the statutory program or requirements established in the Act. Section 112 of the Act clearly requires DOE to give primary consideration to geologic factors in establishing the guidelines. As noted above, no methodology exists for making geologic considerations primary considerations either under the "systems guidelines" or the "program guidelines". In point of fact, the "program guidelines" propose the establishment of three separate site selection procedures based upon specific media, specific hydrogeologic settings, and identification of sites already dedicated to federal nuclear activities. The latter is not consistent with the requirements of Section 112 of the Act and has not been justified by the DOE as either an appropriate site selection procedure or guideline.

Fourth, the DOE proposal does not establish a methodology or process for applying either the "systems guidelines" or the "technical guidelines" to the site selection processes DOE has identified and used.

Detailed Comments

§960.2-0 Definitions

"Accessible environment"--The proposed definition neglects groundwaters and aquifers especially the case of near-surface unconfined aquifers which are routinely "accessed" for public, industrial, and agricultural water supplies. The proposed definition is inconsistent with the letter and objectives of several of the proposed technical guidelines and their respective favorable and unfavorable conditions; §960.5-1-1 "Depth to Underground Facilities", §960.5-2-2 "Hydrologic modeling" which both reference "forseeable human activities" including groundwater withdrawals, and §960.5-6-1 "Natural resources".

Although the definition reflects the definition used by the EPA in its proposed rule (47 FR 58196, December 29, 1982), this definition is not adequate to protect the public health and safety and the environment. EPA's draft environmental assessment on its proposed rule (DEIS-EPA 520/1 82-025, December 1982) acknowledges the significance of impacts from groundwater contamination within the proposed 10 kilometer controlled area. The DEIS states:

"Accordingly, our approach does not provide any direct protection for the relatively small amount of groundwater that could be within 10 kilometers of a geologic repository. However, since the amount of groundwater left unprotected should be kept as small as possible, consistent with other requirements, we expect that the Federal environmental impact statement for each disposal system will identify all sources of groundwater within 10 kilometers of the disposal system, will describe the potential long-term effects of possible contamination of these sources of groundwater, and will consider these effects as one of the factors in evaluating alternative sites."

(EPA DEIS @ 114)

As stated by EPA, DOE should consider groundwater contamination within the proposed kilometer control zone as a factor in site selection. Since the Act has modified the application of NEPA to the site selection process subsequent to EPA's promulgation of the proposed rule and DEIS, and assigned DOE alternative responsibilities through site selection guidelines and environmental assessments, EPA's admonition should be taken as a literal requirement by DOE at this time and included in the proposed site selection guidelines.

The EPA proposed standard is itself defective since it clearly and incorrectly assumes that the groundwater regime within the 10 kilometer zone is static and does not involve significant flow. Groundwater and sub-surface aquifers can and will flow, often at significant rates (such as at the Hanford Site), through or across portions of, or all of, the 10 kilometer zone. As a result, groundwater outside of the zone is not fully protected as EPA contends.

The 10 kilometer zone is also predicated upon "passive insitutional measures" for its integrity and justification.

EPA envisions these passive measures to include permanent markers, public records, Federal ownership and other measures (48 FR 58201). Control by these measures has not been demonstrated by EPA or by DOE to be functional or adequate. In fact the DOE's "Final Environmental Impact Statement on the Management of Commercially Generated Radioactive Waste" (DOE/EIS-0046F, October 1980) concludes that the applicability of institutional controls is controversial at best. The FEIS stated that:

"The analysis of these issues (institutional controls) is, of necessity, purely speculative, and based on historical examples that provide no firm basis for making predictions."
(FEIS @ §3.5.2.2)

Furthermore, the FEIS concludes that:

"Waste management systems adopted in the present time period should place minimal, if any, reliance on any human management after the repository is closed."
(FEIS @ §3.5.2.2)

The DOE confirmed this position over the inappropriateness of using institutional controls in its filing in the NRC's waste confidence proceeding (DOE/NE-0007 "Statement of Position of the United States Department of Energy", April 15, 1980). The DOE Statement concluded that:

"The continued existence of institutions charged with that responsibility cannot be ensured over the extended period of time required for waste isolation. Long-term active institutional controls will not be assumed in the NWTs Program safety analyses."

(DOE Statement @ § II.E.3.3.1)

I note parenthetically that although DOE in its "Statement of Position" refers to "active institutional controls" rather than the "passive" controls used in the EPA proposed rule, DOE includes "land-use control rights by the Federal Government" in its categorization of institutional controls.

The definition of "accessible environment" runs contrary to acknowledged requirements for protection of public health and safety and the environment and is an inadequate and inappropriate definition both under the EPA proposal and the DOE proposed guidelines.

§960.3-0 System Guidelines

DOE states that the purpose of the "system guidelines" is to define general requirements for system performance. DOE, however, has used an overly narrow definition of "system performance." The proposed guidelines are intended, under the Act, to be used for the recommendation of sites for repositories which must, as a matter of law, meet applicable EPA and NRC standards. §960.3-0 merely reiterates that such repositories are expected to meet legal requirements. They do not establish guidance on how those legal requirements are to be met.

The charge to the DOE in Section 112 of the Act is not limited to the performance of the repository per se, but rather

to establish a siting process "for the recommendation of sites." These guidelines are required by the Act to establish detailed geologic considerations as the primary criteria for site selection. In addition, Section 112 details an extensive list of other considerations including many off-site considerations such as transportation and proximity to population areas and restricted federal land-use areas.

The "System guidelines" proposed under §960.3 do not, as required by Section 112 of the Act, comprise a sufficiently broad range of system components or consequences, such as transportation, and as such do not provide an adequate or legal basis for site selection.

§960.3, as proposed, does not, as required by U.S. and international radiation protection guidance, require radiation exposures to be kept as low as reasonably achievable (ALARA) for either phase of repository operation or for off-site consequences such as transportation. There is also doubt whether ALARA would provide a stringent enough radiation protection philosophy for the post-closure period since benefits to future generations of waste-generation activities would appear to be negligible.

No Application Methodology

§960.3, as proposed, does not provide a methodology or confidence levels for the application of specific criteria to be used in determining the adequacy of the repository site to the proposed NRC and EPA standards. The statement contained in §960.3-2 that a site will be disqualified if it cannot be modeled with reasonable confidence begs the question of how the site will, in fact, be modeled and how the technical site selection criteria identified in §960.5 will be applied.

DOE has clearly employed site selection and criteria weighing methodologies in selecting sites, notably the Hanford Site. DOE's environmental assessments concerning the Hanford Site contain detailed discussions of the site selection process although the specific methods for weighing site selection criteria are incorporated by reference (see DOE/EA-0188, September 1, 1982 @ §2.2.3 and DOE/EA-0210, February, 1983 @ §3.5).

The absence of any procedures for applying the technical criteria under §960.5 in evaluating the proposed repository systems and off-site consequences against the performance objectives in §960.3 is a serious omission especially in light of the fact that DOE has apparently already made such determinations in the case of Hanford. Such procedures should take into account the unique requirements of different classes of sites based upon geologic media and hydrogeologic considerations. Such procedures, as required by Section 112 of the Act, must make geologic considerations primary.

§960.4 Program Guidelines

As noted above, the proposed "program guidelines" fail to establish procedures or a methodology for applying proposed

"technical guidelines" or system performance criteria to individual sites . §960.4 , which purports to establish "...how DOE will conduct its program to identify and select potential sites...", makes no reference whatsoever to either the §960.5 "technical guidelines" or the §960.3 "systems" performance criteria or how or when they are to be applied during the selection process.

In light of the fact that DOE has apparently made such determinations in the case of the Hanford Site, this is a serious omission. To the extent that the DOE has delegated its responsibility to establish site selection procedures and decisions to its contractors (Woodward-Clyde Consultants and Rockwell-Hanford) in the case of Hanford, the site selection decision for that site is in question.

The proposed rule and preamble describe three site selection processes which may be used, and in fact have been used, for selecting repository sites. §960.4-2 of the proposed guidelines identifies the three processes as the location of specific media, examination of hydrogeologic settings and the identification of sites already effected by Federal nuclear activities. The proposed "program guidelines" fail to establish any relationship between these three dissimilar site screening procedures and the applicability of the "technical" or "performance" guidelines.

Use of Federal Land-Use for Site Selection

The Act does not authorize DOE to establish either site selection guidelines nor site screening or selection procedures based upon areas "...already dedicated to the nuclear activities of the Federal Government." In fact, Section 112 of the Act is quite specific about the scope and nature of the site selection guidelines and the nomination process and clearly requires geologic considerations to be the primary criteria for selection of sites. This requirement is clearly at odds with the third site investigation process identified in §960.4-1 by which sites are identified on the basis of federal nuclear use. DOE fails in the proposed rule to explain or justify this federal nuclear activity land-use approach.

Although DOE has frequently identified its intention to select potential repository sites on the basis of current federal nuclear activities, we can find no explanation or justification for such a policy except historical precedent and convenience.

(see NWTS-4 "National Plan for Siting High-Level Radioactive Waste Repositories and Environmental Assessment", February, 1982)

(see FEIS on "Management of Commercially Generated Radioactive Waste" Vol. I, December 1980 @ §5.2.1 Geologic Site Selection")

(see ONWI-33(2) "NWTS Criteria for Geologic Disposal of Nuclear Wastes: Site Qualification Criteria", January, 1980)

(see DOE/NE-0007 "DOE Statement of Position" in the NRC Waste Confidence Proceeding, April 15, 1980 @ §II.A.2 "NWTS Program; Conservative Approach to Ensuring Safety"; §II.D.4 "Investigative Methods"; §III.C.1 "Selection of Candidate Sites for Repositories")

(see DOE/NE-0007 Supplement 1, "DOE Cross-Statement" in the NRC Waste Confidence Proceeding @ §III.A.15)

DOE has failed to justify this site selection approach. It is at odds with the statutory requirements of Section 112 of the Act and it is at odds with DOE's proposed site selection guidelines which are at issue here. Only one of DOE's proposed guidelines, §960.5-6 "Human Intrusion" identifies federal ownership as a favorable requirement. The Department has failed to identify in the proposed rule adverse consequences of siting the proposed repositories on sites already committed to nuclear activities including extremely hazardous activities such as nuclear weapons testing and nuclear materials production which are carried out at such sites. The DOE has also failed to identify how conflicts with such activities effectively alter site selection decisions.

DOE for example limited its examination of the Nevada Test Site for possible repository locations because of land-use conflicts within the site. DOE noted in its "Statement of Position" before the NRC Waste Confidence Proceeding that:

"Because waste isolation activities must not interfere with the prime mission--nuclear weapons testing--NTS exploration for a suitable site on the Nevada Test Site is currently limited to the southeast portion."

(DOE/NE-0007 @ Appendix B)

The use of federal nuclear activity as a site selection guideline and site selection approach as proposed is inappropriate and may in fact lead to the selection of less desirable sites. This approach should be deleted from the proposed guidelines.

§960.4 Regional Distribution

Section 112 of the Act is quite explicit as to the requirement that DOE consider the proximity of proposed repository sites to high-level waste and spent fuel storage sites and transportation requirements and regional distribution in the siting of repositories. Additional requirements for site selection on a regional basis with consideration of transportation impact and costs are contained in Section 114. The proposed guideline fails to include any of these factors in describing the consideration of regional siting and implies that such considerations will not be taken into account for the first repository.

DOE has failed to address the underlying requirements and conditions to be applied for regional siting and establishes here a policy which runs counter to the letter and intent of the Act.

§960.4-5 and §960.4-6 Schedules for the First & Second Repositories

These sections incorrectly state and grossly oversimplify the statutorily required step-by-step process for selecting the first two geologic repository sites. For example, DOE has failed to state that the nomination of five sites is to follow the

issuance of site selection guidelines and to take place with the consultation of affected states (Sec. 112(b), with public hearings and with presidential review (Sec. 112(c)). The guideline also fails to state that the nomination must be accompanied by a detailed environmental assessment.

DOE also fails to state that the recommendation of three sites for characterization must be based upon a review of the environmental assessment and requires completion of a site characterization plan. DOE fails to note that the statutory deadline for selection of sites for characterization is January 1, 1985 for the first repository and July 1, 1989 for the second.

DOE fails to state that the final recommendation of repository sites must be accompanied by a full environmental impact statement, must be the subject of completion of characterization activities, is subject to consultation with affected states and Indian tribes and congressional review. DOE also fails to state that the two dates provided in the Act for submission of the final site recommendation (March 31, 1987 and March 31, 1990) may be extended by the president until March 31, 1988 and March 31, 1991.

In short, DOE in both §960.4-5 and §960.4-6 misrepresents the statutory procedures, schedules, requirements, and responsibilities the Secretary and the Department must implement. DOE has made it appear that its schedule for repository selection is to be governed by the March 31, 1987 and March 31, 1990 dates when in fact these dates are adjustable and when the DOE has numerous statutory mandates it must fulfill leading up to the recommendation of a final site.

DOE states in the preamble to the proposed guidelines that it has conformed its siting schedule to the requirements of the Act. To date, this has not been the case. DOE has established schedules which compromise statutory requirements for the interim steps leading up to the 1987 and 1989 site recommendation dates. DOE even failed to consult with affected states prior to promulgation of the proposed guidelines as required by the Act. DOE's capricious description and incorporation of repository site selection schedules in these two proposed guidelines indicates that DOE has not, as stated, conformed its site selection schedule to the Act.

§960.5-0 Technical Guidelines

EPI believes that DOE's failure to establish a methodology for applying the "technical guidelines" to individual sites or classes of sites has resulted in unnecessarily vague and imprecise technical guidelines. In very few instances are actual "qualifying" or "disqualifying" conditions identified despite statutory direction in the Act. No guidelines are media specific, for example. An additional negative result is that the guidelines tend to be lenient or lax since they must be applied to all sites as individual criteria. The "technical guidelines" should be reevaluated and resubmitted consistent with an overall methodology for their application.

The proposed guidelines give very little actual guidance

for identifying or eliminating sites. The proposed "technical guidelines" are obviously closely related to those guidelines developed by ONWI under contract with DOE (see ONWI-33(2), January 1980) and to those guidelines derived from ONWI-33 and included as Appendix A in NWTS-4, DOE's national site selection plan. It is not clear that these preceding exercises, in fact, establish an adequate basis for making the technical proposals required in this proposed rule.

The DOE inclosed a cover letter in ONWI-33(2) signed by then Acting Deputy Assistant Secretary for Nuclear Waste Management, Sheldon Meyers stating that:

"Each NWTS project (e.g. Basalt Waste Isolation Project, etc.) will develop quantitative specifications, technical requirements, and methodologies specifically applicable to their particular project. The project-specification information will be compatible with these general site-qualification criteria, and will be issued later as appendices to this document."

(see ONWI-33(2), January 1980)

In fact, these general guidelines are not media specific and give little guidance on evaluating sites, including alternative sites in the same media, on a comparative basis.

§960.5-1 Site Geometry

The comparable criteria contained in NWTS-4/Appendix A (see criteria 3.1) stated that the site must have "geometry adequate for repository development". In many ways, the NWTS-4 criteria is a more appropriate and more rigorous requirement than that proposed here which merely requires a rock mass volume adequate for placement of the repository. Shape, uniformity of the strata, capability of the strata to provide necessary thermal and retardation considerations would not be included in the proposed guideline.

§960.5-2 Depth to Underground Facilities

There is no indication that 200 meters is a controlling depth for human intrusion and as technology advances and more easily tapped aquifers and natural resources are depleted, the proposed 200 meter requirement will become increasingly meaningless. The depth to underground facilities to alleviate human intrusion should be dealt with in that part of the "technical guidelines" concerning that aspect (§ 960.5-6) and should not be interjected as a geologic consideration. While 200 meters may be appropriate for geomorphic purposes, it is not clear that it accurately reflects that consideration but rather appears to be a "hybrid" value aimed at satisfying dissimilar considerations. The 300 meter "favorable condition" also appears to be a somewhat arbitrary value. This guideline should be reevaluated strictly from the standpoint of the geologic integrity of the repository system.

§960.5-1-2 Thickness and Lateral Extent of Host Rock

The comparable criteria contained in NWTS-4/Appendix A (see Criteria 3.1.2) provided that the controlling condition be the "...thickness and lateral extent of the geologic system surrounding the waste emplacement area" and that this be sufficient to incorporate a "buffer zone". The proposed guideline limits consideration to the ability of the host rock merely to contain the underground facility. The proposed guideline, therefore, is less rigorous since it need not provide a "buffer zone" to account for greater than expected stresses during construction or operation or post-closure periods. The proposed guideline only relates to the size of the repository and not to the ability of the host rock to accept and conduct thermal or physical stresses. Since the ability of the host rock to physically accommodate the repository is only one factor, and generally a minor one, in considering the thickness of the host rock, the proposed guideline is seriously inadequate.

§960.5-2-1 Geohydrology

It is somewhat difficult to accept that a geologic repository guideline for geohydrology would not have any potentially adverse conditions since geohydrology will be one of the principal release/containment mechanisms for the vast bulk of the containment period. Geohydrology, consistent with the requirement in Section 112 of the Act, should be designated as a "primary consideration."

The methodology suggested by the guideline, that of a pre-emplacement ground water travel time of 1000 years, is highly questionable since the geologic formation will, under any scenario be subject to thermal load and other factors which render any pre-emplacement value irrelevant. An example of such a circumstance would be the behavior of interstitial clay deposits in Hanford basalt under greater thermal load. The guideline does not adequately address the post-emplacement environment and the acceptable level of impact of the repository on the geohydrologic regime without compromising predictability.

§960.5-2-2 Hydrologic Modeling

Since it is well recognized that the integrity and performance of the proposed repository must be assessed through modeling, the proposed guideline should include a greater degree of confidence than that stated in the proposed guideline, i.e. the proposed requirement that the "...regime shall be capable of being characterized with sufficient certainty to permit modeling...". The guideline should specify that the "...geohydrologic regime shall permit modeling sufficient to provide a reasonable assurance that radionuclide releases from the proposed repository will be less than...".

The potentially adverse factors listed 1 through 6 should be designated "disqualifying" conditions, since they would clearly render the necessary modeling, design, and licensing bases irrelevant and their probability of doing so is high.

§960.5-2-3 Shaft Construction

This guideline is seriously defective, as proposed, since it fails to address the post-closure integrity of shaft and repository sealing. The guideline, as proposed, also fails to address construction and post-closure transmission between aquifers penetrated by the shaft along the shaft zone. Such transmission, which was identified in ONWI-13 "Estimated Environmental Effects of Deep Drilling" Technical Report, December 1980, could lead to contamination of adjacent aquifers or the creation of additional or shorter release pathways.

§960.5-2-4 Dissolution Features

The DOE obviously has great confidence in its ability to predict the rate and consequences of an active dissolution front over a 10,000 year period, though it would appear to be unfounded. This guideline would be appropriate, at best, only for a potentially active dissolution front. An active dissolution front should be a "disqualifying" condition.

§ 960.5-3 Geochemistry

As in the case of geohydrology, geochemical characteristics will serve as a major release/containment mechanism over the greater portion of the containment period. Geochemistry should be designated a "primary consideration" as required under Section 112 of the Act. Similarly, the proposed guideline should be rephrased as a positive condition, rather than as a negative condition which should be limited in order to limit releases, i.e. "...geochemical characteristics will prevent radionuclide releases greater than...".

§ 960.5-4 Rock Characteristics

The proposed guideline, unfortunately, leaves out repository construction from the list of qualifications although such considerations are addressed in a sub-guideline. The ability of a site to tolerate construction without immediate or accumulated stress effecting the integrity of the site (i.e. fracturing or subsidence, improper or inadequate sealing, etc.) should be a prime consideration under this guideline.

§ 960.5-4-1 Physical Properties

As in §960.5-4 above, the proposed guideline does not consider stresses that can be expected from repository construction but only considers interactions between waste and host rock. Similarly, the proposed guideline does not address the capability of the rock to be sealed or backfilled as part of repository closure.

§ 960.5-4-2 Operational Safety

The proposed guideline suggests that underground and construction safety is at issue and not the radiological safety of the repository workforce. If this is in fact the case, the application of NRC and DOE safety requirements are not sufficient. Underground construction should be governed by standard OSHA and MSHA mining safety requirements. Neither DOE nor NRC have the expertise or the authority to establish occupational safety requirements for repository construction.

§ 960.5-6 Human Intrusion

§ 960.5-6-1 Natural Resources

The guideline does not take into consideration the fact that exploration history or past use may not give an accurate view of natural resources within the region or on the site. This may especially be the case on federally owned land where mineral exploration may have been restricted or simply in the case where particular resources have been in abundant supply and extensive exploration has not been required.

The guideline also defines inappropriate "favorable" and "potentially adverse" conditions. The proposal that resource concentrations not be "significantly greater than the average condition for the region" is not a favorable condition and is not a limiting condition. Not only may the average concentration be high enough to encourage extensive exploration and extraction, but the presence of even marginally economic resources may be an inducement for further exploration. Even if the guideline were set as a requirement that resource concentration in the region and the concentration near the site be negligible, as we suggest, it may not deter exploration if a high market value is placed on the resource in question.

The "potentially adverse" condition understates the economic value of resources which will increase as more easily obtained deposits are depleted especially hydrocarbons. Criteria of "currently feasible" or "potentially feasible" economic extraction can, at best, be extrapolated only a few decades. As we have seen with the effects of OPEC on hydrocarbon exploration, the economic value of resources is highly volatile and not even directly related to availability of lower cost deposits.

§ 960.5-6-2 Site Ownership and Control

As discussed under §960.4, DOE has not made a sound case for the role of federal ownership and control beyond the operation stage and has overstated the benefits of federal control while understating the liabilities.

DOE has not demonstrated that federal ownership will limit human intrusion for any meaningful period as noted in comments in §960.2-0 concerning the definition of "accessible environment". DOE has not demonstrated that federal ownership is an appropriate siting or control requirement which can or should be used to reduce the level of control required of non-insti-

tutional repository requirements.

As discussed in § 960.7-4 "Offsite Hazards" which follows, DOE's proposed favorable condition of siting on a DOE reservation may require the site to be located near extremely hazardous activities such as underground nuclear weapons testing or radioactive materials production. Location near these activities, as would be the case at Hanford or the Nevada Test Site, could have an adverse effect on near-term operation and long-term integrity of the repository. The guideline suggests that the only liabilities of siting a repository on a DOE reservation are the possible impacts on existing DOE activities by the repository. This is clearly not the only potential adverse condition.

§ 960.5-7 Surface Characteristics

The guideline uses the term "surrounding area" but does not define the term and does not relate it to the "accessible environment", site boundary, or other designation of the site.

§ 960.5-7-1 Surface-Water Systems

Section 112 of the Act requires the guidelines to take into account the relationship of the location of the proposed repository and several factors including the proximity to water supplies and the effect upon the rights of water users as well as the proximity to populations and various federal special-use lands. The guideline only addresses the impact of surface water features on the repository and not the converse, i.e. the impacts on water users and supplies of the repository, as required by the Act.

§ 960.5-7-4 Offsite Hazards

This guideline overstates the desirability of siting a repository at a DOE reservation. The reservations in question are locations where various extremely hazardous activities are currently carried out or planned. The Hanford Site, for example is immediately adjacent to chemical reprocessing facilities containing large quantities and concentrations of nuclear material including potentially critical quantities of plutonium. The site is also adjacent to the N-Reactor production facility, the Fast-Flux Test Facility and near two Washington Public Power Supply System commercial nuclear powerplants (now under-construction). Although the probability of a major accident at these facilities may be small, the consequences of a serious release at any of the above could greatly effect the repository activities which are expected to extend for upwards of 80 years. The DOE facilities in question have not been subjected to independent licensing review by the Nuclear Regulatory Commission and it is not clear that the DOE's facilities could in fact meet NRC safety requirements.

Similarly, the Nevada Test Site is the location of the Nation's underground nuclear weapons testing facility and adjacent to U.S. Air Force bombing and gunnery ranges. These are not innocuous activities and the siting of a repository

adjacent to the nuclear weapons testing area raises serious questions about seismic impact and possible contamination of the repository site from test shot venting. The guidelines suggest that the only adverse effect on locating a repository adjacent to such activities is the possible interference with those activities. The converse, i.e. the impact of DOE activities on repository operation and integrity, should also be addressed as a "potentially adverse" condition.

§ 960.5-8 Population Density and Distribution

The guideline should also reference NRC Part 20 radiation protection requirements including release from potential accidents during repository and transportation operations. The guideline should also address population projections during the operation and monitoring period of the repository as well as future periods.

§ 960.5-8-2 Transportation

(See Appendix)

§ 960.5-9 Environmental Protection

The guideline should be restated to require that environmental impacts be reduced to the maximum extent practicable and not, as proposed, that only the likelihood of impacts be reduced and that they be mitigated when they subsequently occur only to the extent reasonably achievable.

§ 960.5-10 Socioeconomic Impacts

The proposed guideline understates the range of socioeconomic impacts and limits favorable and unfavorable conditions to economic costs. The socioeconomic impact of the proposed repository will vary depending upon the location. The FEIS on "Management of Commercially Generated Radioactive Waste" (DOE/EIS-0046F, October 1980) noted that for a rural southwestern site, population growth, as a percentage of the region, might be three times higher than for a southeastern repository. In such a case, with a 12 to 15% population increase, the effects of development on property values, cost of living, availability of housing, and the quality of life could be large and could not be accommodated merely by "reasonable mitigation or compensation."

The proposed adverse conditions are phrased in terms of their adversity to the DOE and not on the affected community. The proposed guideline is clearly inadequate to the extent that it does not address the range of impacts nor identify the range of potentially adverse conditions even to the extent that DOE has identified them in the FEIS.

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Appendix to the Comments of the Environmental Policy Institute Concerning the Transportation Implications of the Department of Energy's Proposed Nuclear Waste Repository Siting Guidelines (48 FR 5670, February 7, 1983)

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April 6, 1983

Congressional Concern for Transportation Impacts

In the Nuclear Waste Policy Act of 1982 (Congressional Record, Dec. 20 1982, pp. 410516 - 410544) Congress recognized the widespread public concern about unnecessary nuclear spent fuel transportation. In the Interim Storage section Congress directed DOE to "minimize the transportation of spent nuclear fuel" (Sec. 135) to a federally-operated storage facility, and DOE's environmental assessment for any storage site with over 300 metric tons of spent fuel "shall include...

(vii) an assessment of the regional and local impacts of providing such storage capacity at such site, including the impacts on transportation."

The Act explicitly denies any relaxation of or challenge to existing federal or state or local laws regarding nuclear transportation (Sec. 9 and Sec. 137).

The Act directs DOE to draft "Guidelines" for the recommendation of candidate sites for repositories (Sec. 112). The Act indicates clearly the importance DOE's careful consideration of the transportation factors associated with each site:

"Such guidelines shall specify detailed geologic considerations that shall be primary criteria for the selection of sites in various geologic media. Such guidelines shall specify factors that qualify or disqualify any site from development as a repository, including factors pertaining to the location of valuable natural resources, hydrology, geophysics, seismic activity, and atomic energy defense activities, proximity to water supplies, proximity to populations, the effect upon the rights of users of water, and proximity to components of the National Park System, the National Wildlife Refuge System, the National Wild and Scenic Rivers System, the National Wilderness Preservation System, or National Forest Lands. Such guidelines

shall take into consideration the proximity to sites where high-level radioactive waste and spent nuclear fuel is generated or temporarily stored and the transportation and safety factors involved in moving such waste to a repository. Such guidelines shall specify population factors that will disqualify any site from development as a repository if any surface facility of such repository would be located (1) in a highly populated area; (2) adjacent to an area 1 mile by 1 mile having a population of not less than 1,000 individuals. Such guidelines also shall require the Secretary to consider the cost and impact of transporting to the repository site the solidified high-level radioactive waste and spent fuel to be disposed of in the repository and the advantages of regional distribution in the siting of repositories. (my underlining throughout)

In its nomination of 5 sites to the President by January 1, 1985, DOE is directed by the Act to include for each site an environmental assessment (EA) which presumably would include attention to transportation factors. The EA shall include, among other things:

"(iv) a reasonable comparative evaluation by the Secretary of such site with other sites and locations that have been considered;

"(vi) an assessment of the regional and local impacts of locating the proposed repository at such site (Sec. 112 (b) (e)

Transportation impacts should presumably also be fully considered at a later stage under the EIS for DOE's site recommendation to the President. Again DOE is directed to comparatively evaluate at least three alternative sites. (Sec. 114 (f)).

The Act also explicitly highlights transportation concerns among the "offsite concerns" of State and local governments and affected Indian tribes. DOE is directed to begin negotiations with such governmental units and to enter into binding written agreements that shall specify how the DOE shall:

"(5)...assist such State, and the units of general local government in the vicinity of the repository site, in resolving the offsite concerns of such State and units of general local government, including, but not limited to, questions of State liability arising from accidents, necessary road upgrading and access to the site, ongoing emergency preparedness and emergency response, monitoring of transportation of high-level radioactive waste and spent nuclear fuel through such State..."

"(7)...notify such State prior to the transportation of any high-level radioactive waste and spent nuclear fuel into such State for disposal at the repository site."
(Sec. 117 (b))

The agreement negotiated between DOE and the State of New Mexico (Assistant Attorney General Joe Canepa) resolving the state's offsite concerns about DOE's Waste Isolation Pilot Project (WIPP) includes several agreements related to transportation impacts.

Hanford as the "Worst Case" Site for Transportation Impacts

Congressional concerns about the consideration of waste transport impacts reflect awareness of the sobering analysis in the 1981 draft study from the National Academy of Sciences. This as-yet-unpublished draft report details very serious transportation problems which will impact almost all the states and criticizes the current plans for nuclear spent fuel transportation and disposal. The 1981 draft study by the NAS Panel on Social and Economic Aspects of Radioactive Waste Management characterizes as "primitive" the federal regulatory framework for transporting high-level radioactive spent fuel, and the study predicts serious "impasses" between state and federal officials if state officials are not given greater voice in regulating the safety of the projected 75,000 nuclear truck shipments through their states. Without "drastic revision" of current federal regulation, the NAS study says, "the probability of serious accidents will increase."

There has been "a substantial neglect" of the transportation problems for nuclear spent fuel:

"The transportation system would involve most of the states, whether they were the site of nuclear power plants or not. The system would be required to have a high degree of reliability and to operate under the close scrutiny of a concerned public and local officials."

The volume of truck shipments will be significant:

"...if the number of power plants in operation rises from the current 60 to the 150 authorized, the number of shipments to off-site locations will increase. These shipments would begin in the mid-1980s and would increase to nearly 9,000 shipments per year by about 2005, if they were all by truck."

"If all the spent fuel were shipped by truck the rate of growth would be much more rapid, increasing at an annual rate of about 500 truckloads per year. By 2004 there would be on the order of 9000 individual shipments per year. The last statistic is important. If all of these shipments were sent to a single point--either an AFR, a reprocessing plant, or a geologic repository--they would arrive at an average rate of one per hour all year round."

The impact of rail shipments could be clearly unacceptable:

"The rail transport costs used here assume that rail cars originating at various reactors would probably be assembled at depots or marshaling yards. Thus, at any given time there would be a number (perhaps a large number of rail cars carrying spent fuel waiting in marshaling yards across the country. Some of these yards--Chicago, for example--are likely to be in densely populated areas. Moreover, a single car may wait a week or more. This means that for all practical purposes railroad marshaling yards would become de facto short-term AFRs. In a fully operating system hundreds of rail casks might at any given time be "stored" in these yards."

A centralized nuclear waste disposal system is seen as both likely and undesirable:

"Despite the fact that the Department of Energy professes to still have regional repositories under consideration, (U.S. Dept. of Energy 1981), all indications point to the emergence of a relatively centralized waste disposal system for spent fuel, with one or several waste repositories (or a repository with multiple shafts) sites concentrated in

the west or southwest. The candidate sites currently furthest along in characterization are the Waste Isolation Pilot Plant, the Hanford reservation, and the Nevada Test Site. If the one or several repositories planned are located in the west or southwest, the Panel concludes that this choice will result in a waste system which is costly in its transportation requirements, enlarges inequities among regions, is potentially vulnerable to operational bottlenecks, and places significant institutional burdens upon states. The western siting of a single repository will exacerbate all these problems, particularly through the creation of a waste transport system which is national in scope and funnel-shaped in configuration."

The NAS study states bluntly that:

"Federal/state conflicts remain unresolved. While the federal government possesses needed formal authority to implement a waste disposal system, the states possess ample means to challenge federal authority over (particularly) non-radiation issues and could create substantial delay and continued conflict. Although "concurrency" presupposes that agreement will be reached, in fact impasses are likely and there currently exists no effective means for overcoming such impasses."

Several nuclear waste highway route maps have been created by federal government experts at Oak Ridge National Laboratories using a computer model based on routing data supplied by a major U.S. nuclear waste trucking firm, and also taking into account the relevant federal and local nuclear waste routing regulations. The maps show the nuclear route patterns for various likely nuclear waste sites. (Attachment A)

The Environmental Policy Institute extrapolated the ORNL routes maps to show the most likely highway "waste funnel" patterns for two of the top DOE candidate sites for geological high-level (and spent fuel) waste disposal, one at Hanford, Washington, and the other at Moab, Utah. (Attachment B). One pattern that stands out is that the eastern and midwestern states with many nuclear reactors are likely to be shipping their wastes across and into what the U.S. Defense Department (in planning atmospheric nuclear explosions in southern Nevada) called the "virtually uninhabited" areas of western states. On the way, however, shipments will traverse the

largest western cities (St. Louis, Omaha, Des Moines, Denver) that the Interstate highways were obviously built to connect. And the "virtual uninhabitants" of Utah and Nevada have recently emerged from their ghostly non-existence to halt such additional nuclear burdens on their areas as the racetrack MX-missile.

The route maps have generated enormous media interest across the U.S. At least two conclusions emerge from consideration of the NAS-type analysis:

- o In the U.S. citizens are probably not going to tolerate the most hazardous nuclear waste shipments without some real improvements in safety and regulation.
- o When democracy is genuinely allowed to intrude in any area of nuclear decision-making, sticky problems arise.

DOE Guidelines Inadequate

The draft EA for the Hanford site and the DOE draft Guidelines set out an extraordinarily minimal set of decision factors related to transportation impacts. The Guidelines have ample pious language in several places about minimizing risks, e.g., from the Rationales Sections (my underlining throughout):

"4. Regional Distribution. Nuclear plants that generate electricity are located or being built throughout the country. Since the safe disposal of wastes that result from electricity production will likely require the construction of more than one repository, a regional distribution of repositories could provide a more equitable sharing of the impacts of the repository among the people benefitting from the generation of the electricity and from the goods and services produced by that electricity. Furthermore, the transportation of wastes from the location of their production or temporary storage also causes impacts that could be reduced by selecting the routes over which the wastes are transported to minimize risk."

"8. Population Density and Distribution (Section 960.5-8). The density and the distribution of population are always important in site selection. A low population density in the area of the site will minimize exposure to hazards associated with potential accidents. It is also necessary to recognize the impacts that might accrue from the use of likely transportation routes.

The possible advantages of reducing waste transportation must be weighed against the safety margins provided by the environmental and geologic conditions of considered sites. It could very well be that acceptable sites may be found close to centers of waste production or storage, but if these sites are considerably more difficult to characterize and develop, then the benefit of shorter transportation routes may be outweighed by these difficulties. Consequently, DOE policy is to consider transportation and current waste locations as two of a large number of factors."

The Guidelines state (Sec. 960.4-3) that "due consideration" shall be given to regional and local impacts, using the same language that is in the Nuclear Waste Policy Act. But the "regional distribution" consideration has been explicitly delayed until after a remote far-Western site has chosen.

"After the selection of the first repository site, a major consideration in siting additional repositories shall be regional distribution. The DOE shall consider the advantages of regional distribution in the siting of repositories to the extent that technical, policy, and budgetary considerations permit.

The Guidelines' brief section on transportation (960.5-8-2) again virtually quotes in its first paragraph the language of the Act:

"The cost and other impacts of transporting radioactive waste to a repository shall be considered in selecting the repository sites. Consideration shall be given to the proximity of locations where radioactive waste is currently generated or temporarily stored and the transportation and safety factors involved in moving such waste to a repository.

(a) Favorable conditions. Ability to select transportation routes that minimize risk to the general population.

(b) Potentially adverse conditions. Site locations requiring the concentration of transportation routes through highly populated areas.

But the above Guidelines again demonstrate the minimal attitude towards transportation risks. Note that DOE considers what most citizens would view as the worst case situation (concentration of routes through highly populated areas) as only "potentially adverse". Certainly here is one criterion that should be considered as definitely a "disqualifying factor" for a candidate site.

Furthermore, the DOE Guidelines should explicitly describe what assumptions DOE is making about the routing of spent fuel shipments to potential repository sites:

- o Will the current state and local laws restricting nuclear transport be honored?
- o Will these restrictions be overridden by federal preemptive efforts (currently spearheaded by DOT)?

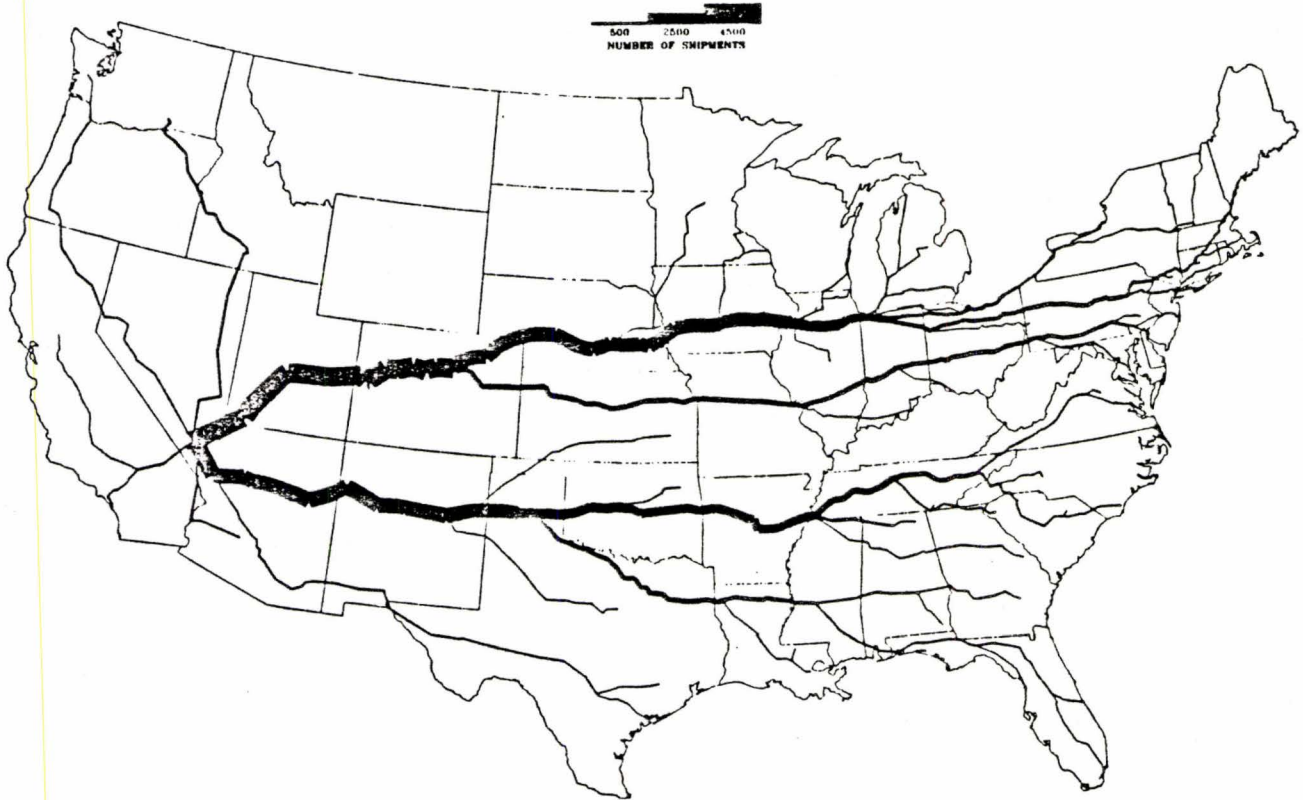
- o Will there be any regional decision-making by state and local officials as to the safest mode and/or routes of spent fuel shipment?
- o Will there be development of a new generation of spent fuel shipping casks, and unlike the current casks will these be fully tested and free from generic defects?
- o Will there be any upgrading of emergency response capabilities along the selected routes, in terms both of training the (mostly volunteer) firefighters who would respond to any serious accident and of providing states and cities with state-of-the-art radiological emergency response vehicles?
- o Will the current restrictions on nuclear transportation imposed by various bridge, tunnel and turnpike authorities be honored?

These are critical questions in any federal or citizen evaluation of transportation risks and impacts. DOE should supply quantitative limits where possible for transportation-related factors, such as the numbers of persons exposed to radiological risks in transportation and the availability of emergency response resources. DOE should rank-order other factors, such as weather impacts on various routes and risks to water supplies and land resources.

Above all, DOE should compare the transportation-related risks and costs of (at least) the first five candidate sites. Anything less on DOE's part risks the appearance of deliberate contempt for nuclear waste transportation concerns among the public and in Congress.

Attachments:

PROJECTED ANNUAL SPENT FUEL SHIPMENTS
TO A WESTERN STORAGE SITE IN 2004
BASIS: TRUCK SHIPMENTS FROM ALL REACTORS
(FOR DEMONSTRATION PURPOSES ONLY)



EPI comment:

This ORNL map shows a southern Nevada waste storage or disposal site creating a nuclear waste funnel with massive waste corridors from the Eastern and Midwestern reactors, along I-40 from TN to NEV and along I-80, I-80/90, I-80, I-76, I-70 from PA to NEV.

ROUTES TO A HANFORD, WASH. WASTE SITE

This EPI map is based on the Oak Ridge National Laboratories map shown in the 1981 draft report of the National Academy of Sciences. This map shows nuclear waste truck routes converging on the proposed high-level waste site at Hanford, Washington. Waste funnels are formed primarily along I-40 from TN to Albuquerque, NM; along I-70 from PA to Denver; and along I-90/I-80 from New York State to Salt Lake City, UT.

The main assumption EPI added to the ORNL map is that the southern reactor shipments would turn north at Albuquerque on I-25 and join the northern reactor I-80 waste stream at Cheyenne, Wyoming.

PROJECTED ANNUAL SPENT FUEL SHIPMENTS TO A WESTERN STORAGE SITE IN 2004 BASIS: TRUCK SHIPMENTS FROM ALL REACTORS (FOR DEMONSTRATION PURPOSES ONLY)



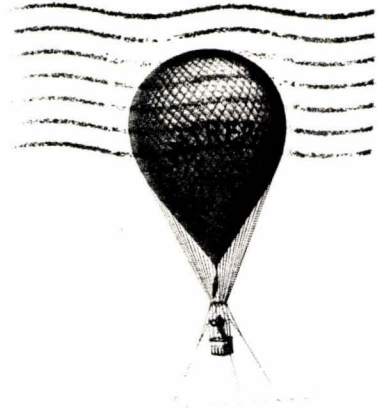
ROUTES TO A MOAB, UTAH SITE

This EPI-generated map shows nuclear truck cargo routes converging on the proposed nuclear waste site near Moab, Utah. The map is a minor adaptation of the Oak Ridge National Laboratory map showing the potential waste site in southern Nevada, which would create a nuclear waste funnel with massive waste corridors from the Eastern and Midwestern reactors, along I-40 from TN to NEV and along I-80, I-80/90, I-80, I-76, I-70 from PA to NEV.

The only major change is to guess that southern nuclear waste shipments would turn north from I-40 at Albuquerque, then take I-25 north to Denver and there join the I-76 and I-70 waste streams. (The shorter highway route from Albuquerque to Moab would require use of non-Interstate routes 666 and 163.)

PROJECTED ANNUAL SPENT FUEL SHIPMENTS TO A WESTERN STORAGE SITE IN 2004 BASIS: TRUCK SHIPMENTS FROM ALL REACTORS (FOR DEMONSTRATION PURPOSES ONLY)





USDOE
 NV Site Characterization
 Mail Stop 555
 Box 14400
 Las Vegas NV 89114

TO: UNITED STATES DEPARTMENT OF ENERGY

DATE 3/31/83

I AM UNABLE TO ATTEND THE HEARINGS ON MARCH 30 & 31. HOWEVER, I AM DEEPLY CONCERNED ABOUT HOW A HIGH-LEVEL RADIOACTIVE WASTE DISPOSAL SITE WILL AFFECT NEVADA AND NEVADANS. SOME OF MY CONCERNS ARE:

- ① transportation of waste through population centers is hazardous
- ② lack of knowledge about contamination possibilities through subsides and entering lower level groundwater sources.
- ③ Waste should be stored where it is generated or no more should be generated until such time as sufficient knowledge exists to reduce toxic life of waste.

USDOE IS ACCEPTING COMMENTS UNTIL APRIL 25. Sent this sheet to USDOE, NV SITE CHARACTERIZATION, MAIL STOP 555, BOX 14400, Las Vegas, NV 89114
 or

Signed Ellen L. Steiner
 Name Ellen L. Steiner
 Address 12045 Broken Hill Rd
 City/zip Reno, Nevada 89511

Send to nearest Citizen Alert office. We will try to present your concerns at the hearing, and we will submit this form to DOE.
 CITIZEN ALERT: Box 5391, Reno, NV 89513 or Box 1681, Las Vegas NV 89101

NSC-72

STATE OF NEVADA
DEPARTMENT OF COMMERCE

NYE BUILDING, ROOM 321
201 S. FALL STREET
CARSON CITY, NEVADA 89710
(702) 885-4250

DIVISIONS
CONSUMER AFFAIRS
FINANCIAL INSTITUTIONS
FIRE MARSHAL
HOUSING
INSURANCE
MANUFACTURED HOUSING
REAL ESTATE
UNCLAIMED PROPERTY

RICHARD H. BRYAN
GOVERNOR

LARRY D. STRUVE
DIRECTOR

April 14, 1983

U.S. Department of Energy
Public Hearings on Nevada
Site Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, Nevada 89114

Re: Submittal of Written Comments in Connection With
Public Hearing for the Proposed Nomination of
Yucca Mountain as a Potential High-Level Radioactive
Waste Repository (March 31, 1983)

Attn: ROBERT M. NELSON, Presiding Officer

Dear Mr. Nelson:

This letter is being sent to supplement the material that was received at the above public hearing in Reno, Nevada. The purpose of this letter is to provide information pertaining to issues to be included in the environmental assessment supporting the Department's formal nomination of the Yucca Mountain and to request that these same issues be addressed in the Site Characterization Plan.

Pursuant to the Nuclear Waste Policy Act, Sec. 112(b)(1)(E), an environmental assessment must be made of the proposed site to be nominated as a high-level nuclear waste repository, which includes, among other items, 1) an assessment of the regional and local impacts of locating the proposed repository at the proposed site, and 2) an evaluation whether such site is suitable for site characterization under the guidelines established under Public Law 97-425 Sec. 112 (a).

The Proposed General Guidelines for Recommendation of Sites for Nuclear Waste Repositories (required pursuant to P.L. 97-425, Sec. 112(a)) published in Vol. 48 Federal Register No. 26, Monday, February 7, 1983 (10 CFR Part 960) contain a guideline concerning mitigation of any adverse social and/or economic impacts resulting from the project. Section 560.5-10 of the proposed guidelines states as follows:

"The location of the site shall be such that any significant adverse social and/or economic impacts

NSC-72

April 14, 1983

on communities and regions resulting from the repository construction, operation, and decommissioning or the transportation of radioactive waste to the site can be accommodated by reasonable mitigation or compensation.

(a) Favorable conditions.

- (1) Locally available labor.
- (2) Potential for repository-related increases in local employment, increases in business sales, increases in government revenues, or improvements in community services.

(b) Potentially adverse conditions.

- (1) The existence of, or the potential for, a lack of the necessary labor force or a lack of local suppliers.
- (2) A projected substantial decrease in community services due to repository development.
- (3) Conditions where the development, construction, operation, or decommissioning of a repository may require any purchase or acquisition of water rights that will have a significant adverse effect on the present or future development of the area."

Many of the divisions in the Nevada Department of Commerce will be concerned with several issues suggested in Sec. 960.5-10 noted above, which should be addressed in the environmental assessment and the site characterization plan developed in the Department of Energy in connection with the Yucca Mountain Site.

These issues are as follows:

- (A) What information has been developed by the Department of Energy or any other governmental agency concerning the locally available labor near the site?

April 14, 1983

- (B) What is the potential of the local area near the site to absorb a large increase of the labor force, including the availability of housing, community services, and local suppliers of food and essential consumer goods and services?
- (C) What increased demand on governmental services would result from the construction of this project and what tax revenues have been identified to pay for these services?
- (D) What studies are being done to project the realistic increases in business sales, government revenues, and community services in the event the Yucca Mountain Site is developed?
- (E) What community services in the vicinity of Yucca Mountain would be decreased as a result of repository development?
- (F) Will the acquisition of water rights be necessary to develop the project?
- (G) If water rights must be acquired, will they be acquired pursuant to state law?
- (H) What impact will the acquisition of water rights for the project have on the present or future economic development of the area in the vicinity or region of the Yucca Mountain Site?
- (I) How will the transportation of the radioactive wastes to the proposed site affect property values, insurance rates, and availability of housing and commercial financing both in the immediate vicinity of the site and along the corridors in the State of Nevada where the waste will be transported?
- (J) Other than the construction and operation of the site itself, what other long term industrial or commercial enterprise can be anticipated would be developed in the vicinity of the proposed Yucca Mountain repository after it has been developed and placed in operation?

Robert M. Nelson
Page Four

April 14, 1983

(K) What type of financial assistance would be necessary to enable the communities and businesses in the area impacted by this project to accommodate any anticipated growth in the labor force or community services or consumer needs? Will studies be done to determine if such financing is available?

Thank you for your consideration of these matters.

Sincerely,



LARRY D. STRUVE
Director

LDS/ab

cc: Governor Richard H. Bryan
James I. Barnes, Director
Department of Energy

April 14, 1983

United States Department of Energy
Environmental Assessment for Nevada
Site Characterization
Mail Stop 555
P. O. Box 14400
Las Vegas, NV 89114

Dear Sirs:

I have a suggestion for a location of the proposed radioactive waste repository.

As we all know, Nevadans, myself included, are fiercely proud and protective of our "silver state" with its vast desert wilderness and its wildlife and we're tired of being used as the country's dumping ground and (NSEC-70)

nuclear test site. We're just as concerned as the rest of the country about the future health of our children and their children's children.

Every day we hear frightening true stories of the havoc and health problems brought on by man-made chemicals like agent orange, nuclear waste products etc.

Scientists can sure develop all these harmful products but when it comes to making them harmless suddenly they play dumb.

We also know how eagerly President Reagan is constantly pushing for increased defense spending and how much he genuinely loves nuclear weapons.

My suggestion, therefore, for the new repository site for nuclear waste material, be his ranch in southern California.

It would be a perfect location, think about it for a moment.

President Reagan is usually there on vacation every two weeks anyway so who would be in a more perfect position to supervise the construction and make on-the-spot inspections; than he.

Why I'm sure he'd just love this extra opportunity to further serve his fellowman and his country by offering his own property as the next nuclear dump site.

Sincerely,

Mrs. Uladoff
140 Spear
Sparks, Nev. 89431

Carson City, Nev.
4-3-83

Dept of Energy
Las Vegas, Nev.
Dear Sir:

I am concerned over
the dumping of nuclear waste
in our state. We do not
produce any, yet we are
forced to allow others to put
their garbage here.

What can we do to stop
this?

sincerely yours,

Tennys Frberg

Nevadan for 61 years.

TENNYS E. FRIBERG
1005 Dunbar Drive
Carson City, NV 89701

ACTION HMPO

INFO _____

R. F. _____

AAA

AM: & C

AMD _____

NSC-69

ARTHUR J. MAJEWSKI
48 BOB WHITE WAY
RENO, NEVADA 89502

U.S. DEPT. OF ENERGY
PUBLIC HEARINGS ON NEVADA
SITE CHARACTERIZATION
MAIL STOP 555, P.O. Box 14,000
LAS VEGAS, NEVADA 89114

APRIL 1, 1983.

SIRS:

I DON'T WANT ANY PART OF NEVADA
USED AS A RADIO-ACTIVE WASTE DUMP.

THIS STATE HAS DONE MORE THAN ENOUGH
FOR THIS COUNTRY.

YOU HAVE NO BUSINESS CREATING POISONS
YOU CAN'T DETOXIFY.

YOU HAVE ALREADY PROFANED OUR SACRED
DESERTS WITH YOUR ATOMIC TESTING.

PUT THE NUCLEAR WASTE UNDER THE
WASHINGTON MONUMENT AND THE STATUE OF
LIBERTY. LET THE WHOLE COUNTRY SHARE IT
THAT WAY.

SINCERELY

A. J. Majewski

ACTION WMPD
INFO _____
R. F. _____
AMA 1
AM: & C L
AMD _____

NSC-68

*Rec'd from
A. Roberts - DOE
4/13/83*



NEVADA COUNCIL OF PROFESSIONAL ARCHAEOLOGISTS

April 8, 1983

U.S. Department of Energy
Public Hearings on Nevada Site Characterization
P. O. Box 14400
Las Vegas, Nevada 89114

Dear Sirs:

The Nevada Council of Professional Archaeologists welcomes the opportunity to comment on the Site Characterization procedures regarding the proposed high-level radioactive waste repository at Yucca Mountain. Our first comment is to commend the Department of Energy for their responsible approach to archaeological evaluation of the project area. The support for identifying, testing and evaluation has so far been adequate and our understanding is that such procedures will continue to be properly executed in the future. We wish to thank the Department of Energy for taking this important resource seriously and for the significant efforts to follow existing rules and legislation designed to protect our cultural heritage in a relatively unknown and ordinarily inaccessible area. Keep up the good work!

We hope that any future work will consider the important effects of indirect impacts on archaeological sites caused by increased access and large influx of personnel into an area previously unavailable to casual collectors. This is always a threat in such archaeologically sensitive areas. Great damage to the scientific data base can occur from seemingly innocent activities of personnel walking around on their lunch breaks, picking up artifacts as they are encountered.

It is also a concern of this Council that access corridors be thoroughly surveyed and potential impacts mitigated. We trust that this issue will be addressed in any future land altering actions taken in association with the evaluation and/or development of the Yucca Mountain project area.

Although we do not have any data that will allow us to recommend procedures, we are concerned that a significant amount of increased radiation may affect crucial carbon dating material. Therefore we sincerely hope that if this site is chosen, that storage methods are adequate to guarantee no leakage of radiation into the surrounding areas which could contaminate the rare organic material so pivotal in assessing chronological placement of recovered cultural material. If there is any doubt, we would recommend complete salvage of buried culture-bearing deposits prior to storage of nuclear wastes in the immediate vicinity of the storage area.

Again, we commend the USDOE for the archaeological assessment work supported to date and thank you for the efforts you have made.

Sincerely,

Amy Dansie, Secretary NCOPA

NSC-67

March 30, 1983
3901 Giles St.

Las Vegas, Nevada

89119

Department of Energy
2753 S. Highland Blvd.
Las Vegas, Nevada

ACTION OPA
INFO _____
R. F. _____
AMA ✓
AM: & C _____
AMD _____

Gentleman:

In regards to the proposal of the Nevada Test Site being used for a high level Dump Site, I am in total agreement. Of all the proposed areas in the United States, the Nevada Test Site more than likely, because of the regular testing that has been going on since the late 40's, already has certain areas of high radiation that it would make no difference what was placed there.

NSC-66

● Nuclear waste must be stored somewhere, and the vastness of the test sight is perfect. The news services seemed to play up a hysterical women's view of something they don't understand. This is too bad because it's making a difficult problem worse. From what information that has been available to me about the planned dump area + design should be totally safe. Economically speaking it would also be an asset to this area.

Respectfully,

Gordon W. Smith

Las Vegas, Nevada
April 1, 1983

U. S. Department of Energy
Las Vegas, Nevada

Gentlemen:

This is a written comment on the proposed nomination of Yucca Mountain as a potential high-level radioactive waste repository.

From the comments at the public hearing in Las Vegas on March 31, 1983, the people of Nevada do not want a high-level radioactive waste repository located in the State of Nevada.

Sincerely,

Glenn W. Antrim

Glenn W. Antrim
2971 Las Casitas Way
Las Vegas, NV 89121

NSC-65



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

MAR 30 1983

U.S. Department of Energy
Public Hearings on Nevada Site Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, NV 89114

Dear Sir or Madam:

The Environmental Protection Agency (EPA) has reviewed the March 7, 1983 Federal Register Notice regarding the preparation of an Environmental Assessment (EA) for a HIGH-LEVEL RADIOACTIVE WASTE REPOSITORY, NEVADA TEST SITE, NYE COUNTY. We have the enclosed comments that should be addressed in the EA.

We appreciate the opportunity to comment on this EA Preparation Notice. Please send four copies of the EA to this office when it becomes available. If you have any questions, please contact me at (415) 974-8191 or FTS 454-8191.

Sincerely yours,

Rick Hoffmann
Rick Hoffmann, Acting Chief
EIS Review Section

Enclosure (1 page)

NSC-64

Introductory Comments

The EA should provide a general discussion of the Nuclear Waste Policy Act of 1982 (P.L. 97-425). The discussion should enable the reader to understand the criteria and methodology leading to the site characterization, evaluation, and final designation of a high level radioactive waste repository by the Department of Energy; as well as the interrelationship of the proposed action to the National Environmental Policy Act and all other applicable Federal, State and local laws and regulations. It should also discuss any permits that might be required.

Water Quality Comments

The EA should:

1. Completely describe current drainage patterns in the project locale. Assess how altering drainage patterns and characteristics will affect drainage hydrology, surface runoff, erosion potential, soils, vegetation, and therefore water quality.
2. Describe current ground water conditions in the project locale. Assess all likely changes in ground water resulting from this project (such as water table or chemical composition changes).
3. Identify appropriate mitigation measures to protect water quality both during and after project construction.



DESERT RESEARCH INSTITUTE

University of Nevada System

Vice President for Administration

P.O. Box 60220
Reno, Nevada 89506
(702) 673-7315

March 31, 1983

Information Document
U. S. Department of Energy
Mail Stop 555
Post Office Box 14400
Las Vegas, Nevada 89114

Gentlemen:

We would like to receive a copy of the summary of the "Nevada Nuclear Waste Storage Investigations (NNWSI) and Yucca Mountain" as described in your DOE NEWS RELEASE of March 22, 1983. Please send to the mailing address shown above.

Your cooperation in supplying this material is greatly appreciated.

Sincerely,

Albert Gold
Vice President for Finance
and Administration

ams

Summary mailed 4/20/83

MSC-63

MAYOR BILL BRIARE
COMMISSIONERS
RON LURIE
PAUL J. CHRISTENSEN
AL LEVY
WILLIAM U. PEARSON
CITY ATTORNEY
GEORGE F. OGILVIE
CITY MANAGER
RUSSELL W. DORN



CITY of LAS VEGAS

April 5, 1983

Information Document
U. S. Department of Energy
Mail Stop 555
Post Office Box 14400
Las Vegas, Nevada 89114

Gentlemen:

Please mail a copy of "U. S. Nuclear Regulatory Commission's guidelines on the "Standard Format and Content of Site Characterization Reports for High-Level Geologic Repositories." to me at the following address:

City of Las Vegas
Department of Community Planning
and Development
City Hall
400 East Stewart Avenue
Las Vegas, Nevada 89101

Thanking you in advance for your kind attention to this matter.

Sincerely,

DEPARTMENT OF COMMUNITY PLANNING
AND DEVELOPMENT
HAROLD P. FOSTER, Chief

HOWARD A. NULL
Chief of Planning

HAN: jk

Book mailed 4/6/83

NSC-61



Please Place
in Public ^{response}
file

1617 Cordoba Lane apt C
Las Vegas, Nevada
89108

April 4, 1983

To whom it May concern —

As a registered voter, City
employee working for the
betterment of Las Vegas, and
Mother I do not
Support the Continued

RAPE Activity of Nevada!

MX YES! Dumpsite No!
I will become and encourage political
activism against, identify Nevada
as a waste site! I will financially
support and encourage others to
band against this program! Julia Flungin
NVC-60

REVISED SCHEDULES FOR PUBLIC HEARINGS

To Address

The Proposed Nomination Of A Nevada Location For Site Characterization As A Potential High Level Radioactive Waste Repository

The U.S. Department of Energy (DOE) has scheduled two public Hearings to receive comments regarding a proposal to conduct site characterization studies at a Nevada site. Site Characterization is planned to occur at three sites within the United States during the next four years. By March 1987, each site will have been evaluated and one will be selected for recommendation to the President as the proposed location of the nation's first geological high level radioactive waste repository. Requirement for these Hearings is specified by the Nuclear Waste Policy Act (Public Law 97-425), which was signed into law by President Reagan on January 7, 1983. The purposes of the Hearings are:

1. To inform area residents of this proposed nomination and to receive their comments.
2. To solicit issues to be addressed in an Environmental Assessment which must accompany formal nomination for site characterization.
3. To solicit issues to be addressed in a Site Characterization Plan which would be used in studying the potential of the site as a candidate repository site.

The site considered to be potentially acceptable is Yucca Mountain, located in Southern Nye County at the southwest boundary of the Nevada Test Site and Nellis Air Force Bombing and Gunnery Range, and extending into Bureau of Land Management-controlled land. It is approximately 85 miles northwest of Las Vegas. All interested parties, including individuals and organizational representatives, are invited to comment. Written comments regarding the proposed nomination; Environmental Assessment issues; and Site Characterization Plan issues; should be mailed to be received at the address below by April 25, 1983.

Hearings will be held in Las Vegas and Reno, according to the following revised schedules.

Las Vegas

9 a.m. to 6 p.m.
(recess - Noon to 2 p.m.)
Wednesday, March 30, 1983
University of Nevada - Las Vegas
Moyer Student Union Ballroom
Las Vegas, Nevada

Reno

10 a.m. to 7 p.m.
(recess - 1 p.m. to 3 p.m.)
Thursday, March 31, 1983
University of Nevada - Reno
Pine Room-Jot Travis Student Union
Reno, Nevada

For more information, write:

United States Department of Energy
Environmental Assessment for Nevada Site Characterization
Mail Stop 555 • P.O. Box 14400 • Las Vegas, NV 89114

NEEDS HANDOUTS

Cynthia Huth
6224 Katella
Las Vegas, NV 89118 *NSC-58*

Need handouts for the following:

Keith Sargent
2212 Isabelle Avenue
Las Vegas, NV 89101

NSC-54

Dennis Brooks
4000 Vegas Drive
Las Vegas, NV 89108

NSC-55

Maureen Wuruck
1865 Roxford
Las Vegas, NV 89109

NSC-56

Herb Gilkey
2009 Las Flores
Las Vegas, NV 89102

NSC-57

MARCH 30, 1983

UNITED STATES DEPARTMENT OF ENERGY
ENVIRONMENTAL ASSESSMENT FOR NEVADA
SITE CHARACTERIZATION
LAS VEGAS, NEVADA

DEAR SIRS:

AS A 12 YEAR RESIDENT AND HOMEOWNER,
I CONSIDER YUCCA MOUNTAIN UNACCEPTABLE
AS A SITE FOR A HIGH LEVEL RADIOACTIVE WASTE
REPOSITORY. HAVING HIGH LEVEL WASTE
TRANSPORTED THROUGH OR NEAR LAS VEGAS
CAN ONLY BRING A POOR IMAGE OF THE
AREA TO VISITING TOURISTS. CONSIDERING
THE POOR RECORD OF WASTE PROBLEMS IN THE
BEATTY DUMP, I FEEL ANYTHING TO DO
WITH RADIO ACTIVE WASTE IN THE AREA TO
BE A THREAT.

6308 DAYTON AVE,
LAS VEGAS, NEVADA

SINCERELY,

Harvard Smith
HARVARD SMITH
NSC-53

University of Maryland

Department of Chemical and Nuclear Engineering
COLLEGE PARK, MARYLAND 20742

Rec'd
3/31/83

28 March 1983

Information Document
U.S. Dept. of Energy
Mail Stop 555
P.O. Box 14900
Las Vegas, Nevada 89114

Dear Sirs:

This will refer to your news Release
of 22 March 1983.

Please send me a copy of the summary
of "Nevada Nuclear Waste Storage Investigation
(NNEWSI) and Yucca Mountain"

Dick Duffey
DICK DUFFEY
Prof., NUC, Engg



Tel. 301-454-2431

NSC-51

5912 Halifax Avenue
Las Vegas, NV 89107
March 28, 1983

United States Department of Energy
Environmental Assessment for
Nevada Site Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, NV 89114

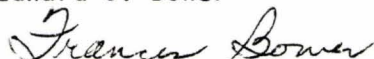
Re: Location for Radioactive Waste Repository

We favor the location of a potential high level radioactive waste repository in the state of Nevada.

Very truly yours,



Edward J. Bower



Frances Bower

March 24, 1983

Stephen C. Rohl
2840 Constantine Ave
Las Vegas NV 89101

Department of Energy
High Level Nuclear Waste Depository Hearings

I wish to make a formal request to speak at the hearings to be held in Las Vegas on March 30th. I have no prepared remarks and I will be representing no one other than myself.

Respectfully, I formally object to this request procedure and the 10 minute time limitation that has arbitrarily been placed on our right of Freedom of Speech by the D.O.E. This critical issue desires the response of as many who wish to speak for as long as their comments take.

Secondly I object to the hearing taking place only during regular business hours thereby intentionally excluding a large number of people that may wish to participate.

Stephen C. Rohl

NSC 44

20 March 1983
Reno, NV

US Department of Energy
Public Hearing on NV Site Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, NV 89114

Dear Sirs,

I am formally requesting time to speak at the public hearing in Reno on March 31, concerning high-level radioactive waste dumping.

I will speak on behalf of myself, as a private citizen but as an atmospheric aerosol specialist.

Thank you,

(Dr.) C. Fred Rogers
560 Cranleigh Dr.
Reno, NV 89512

NSC 43

To: U. S. D. O. E.
Public Hearing on NU Site Characteristics
Mail Stop 555
P. O. Box 14400
Las Vegas, Nevada 89114

From: To Anne Garrett

I should like to reserve
speaking time at the Reno
meeting on the above-named
matter March 31. Thanks.

To Anne Garrett
Box 27
Baker, Nevada 89311

March 14, 1983

NSC 42

To: U. S. D. O. E.
Public Hearing on Nevada Site Character.
Mail Stop 555
P. O. Box 14400
Las Vegas, Nevada 89114

From: Joseph F. Griggs, Jr.

Please reserve time for
me to respond orally to
your request for public
recommendation of issues
to be covered in the E.I.S.
for radioactive waste storage
in Nevada. I will
attend the meeting in Reno
on March 31.

March 14, 1983

Joseph F. Griggs Jr.
Box 488
Baker, NV 89311

NSC-40

from

PEGGY WEAVER

19

To

Phone Call

Clarice Haycock

Haycock Distributors

PO B 340

WV, Riv. 89125

3-24-83
sent book

NSC-46

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: John H. Emerson

DATE: 3-19-83

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
Citizen Alert-Reno. Thank you.

John H. Emerson
556 Marsh Ave.
Reno, NV 89509

NSC-38

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: Janice D Whitefeather

DATE: March 18, 1983

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
my grandchildren. Thank you.

Janice D Whitefeather
PO Box 419
Schwarz, NV 89429

NSC-39

Duplicate

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: Dagmar Thorpe

DATE: March 19, 1983

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
Native Nevadans for Political thank you.
Education and Action

[Signature]
35 RESERVATION ROAD
RENO, NV 89502

NSC-37

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: Dagmar Thorpe

DATE: March 19, 1983

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
Native Nevadans for Political thank you.
Education and Action

[Signature]
35 RESERVATION ROAD
RENO, NV 89502

NSC-37

Theodore E. Oleson, Jr.
305 W. 4th Ave.
Sparks, NV 89431

March 18, 1983

U.S.D.O.E.
Public Hearing on Nevada Site Characterization
Mail Stop 555
Box 14400
Las Vegas, NV 89114

To Whom It May Concern:

I am writing to inform you of my desire to speak at your March 31st hearing in Reno, Nevada. I would like to speak after 1 pm.

Thank You,

Theodore E. Oleson, Jr.
Theodore E. Oleson, Jr.

NSC-36

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: Peggy Tward DATE: March 16, 1983

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
League of Women Voters. Thank you.

of Nevada

Peggy Tward
523 2nd TELEGRAPH
CARSON CITY, NV 89701

NSC-32

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: Leanne Haimowitz DATE: May 15, 1983

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
myself. Thank you.

Leanne Haimowitz
2601 Polaris Dr
Reno NV 89509

NSC-33

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: SUSAN OER DATE: 3.18.83

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
CITIZEN ALERT. Thank you.

Susan Oer
3585 ORENSBY LN
CARSON CITY NV 89701

I CAN ONLY ATTEND
12-1, 3-3:30 - REQUEST
TIME THEN.

NSC-34

TO: USDOE PUBLIC HEARING ON
NV SITE CHARACTERIZATION, MAIL STOP
555

FROM: JON UIQOREN 3-18-83

I AM FORMALLY REQUESTING TIME TO
SPEAK AT THE PUBLIC HEARING IN RENO
ON MARCH 31 ON RADIOACTIVE WASTE.

JON UIQOREN
5860 HOME GARDENS
RENO, NV

NSC-35

March 18, 1983

Presiding Officer
D.O.E. Public Hearings on
Nevada Site Characteristics
Mail Stop 555
P. O. Box 14400
Las Vegas, NV 89114

Dear Sir:

Listed below are questions (Issues) for the 3/30/83 hearing in Las Vegas.

1. Are spent nuclear fuel, high-level, and transuranic radioactive wastes valuable resources?
2. Are they strategic materials that should be considered in emergency preparedness planning?
3. Are they a cost-effective fuel for nuclear fusion power plants?
4. Are there significant advantages to locating a nuclear power plant close to a nuclear waste repository?
5. Are there significant advantages to locating a nuclear decontamination facility close to a nuclear waste repository?
6. Could nuclear waste canisters and contents be indistinguishable from MX Missile canisters and contents?
7. Do the answers to questions 1 through 6 lead to the conclusion that the Yucca Mountain Repository would be vital to the well being of the U.S.A.?
8. Is rail transport of nuclear waste being proposed?
9. Is there any site in the 48 contiguous states that is as remote?
10. What is the size proposed for the repository?
11. Could more than one repository be located on or adjacent to the test site?
12. What are the proposed manpower loads for site preparation, active operations, deactivation, and care taking phases?
13. What is the economic impact on the immediate area? The region?
14. What repository needs can be supplied from the immediate area? The region?

*Note: Same letter.
NSC-30 sent
Secretary to
Chris West*

*NSC-30
NSC-31*

Questions for D.O.E. Hearing 3/30/83 / cont'd

15. What capabilities at the repository could benefit the immediate area?
 - A. Weather station information
 - B. Seismic information
 - C. Hydrogeological information
 - D. Geochemical information
 - E. Ground-water information
16. Could utilization of the Delphi Technique solicit and receive more usable input from the public, local and state officials?
17. Would a Delphi Panel representing irrigation, industry, domestic livestock, energy, industry, local and state officials with some nuclear training provide more effective public inputs?
18. Should such a Delphi Panel have security clearances for maximum effectivity? (Note: There are local men with some nuclear familiarity and foreman security clearances in each of these fields of endeavor.)
19. Would it be possible to be late on the agenda? If these questions had been answered, I would edit them out. But, if the discussion raised other questions, I would write them out and submit them to the presiding officer at the last break.

Thank you,

James E. Owen
Rt. 15, Box 518
Amargosa Valley, NV 89020
(702) 372-5569

JEO/jw

cc: Chris West

March 17, 1983

United States Department of Energy
Public Hearings on Nevada Site Characterization
Mail Stop 555
P. O. Box 14400
Las Vegas, Nevada 89114

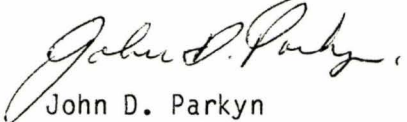
Dear Sir:

I wish to write in support of the proposed nomination of the Nevada site for site characterization studies published in the Federal Register, Volume 48, No. 45, Monday, March 7, 1983.

The geographic terrain and the level of ground water within this portion of the State of Nevada coupled with the low population density of this area make this site an excellent candidate for nuclear waste storage. It is very important that we give strong consideration to the Nevada site in light of the above mentioned safety factors. While there may be public resistance on the grounds that Nevada is not a nuclear generation state in the industrial sense, it is important that the greater good of our society be the determining factor rather than local political concerns. From an environmental impact assessment, this appears to be the ideal site for site characterization at this time. I strongly urge you to accept it.

Sincerely,

DAIRYLAND POWER COOPERATIVE



John D. Parkyn
LACBWR Superintendent

JDP:eme

NSC-29



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

March 17, 1983

USDOE
Hearing on Nevada Site Characterization
Mail Stop 555
Box 14400
Las Vegas, NV 89114

Dear Sir/Madam:

I am interested in testifying at the Reno hearings on high level nuclear waste on March 31, 1983. I would greatly appreciate being scheduled to testify either before noon, or after 3:30 p.m.

Sincerely,

Glenn C. Miller, Chairman
Toiyabe Chapter

*Envelope:
Post Office Box 8096
Reno, NV 89507*

10.5 Beech #22

Reno, NV 89512

March 18, 1983

U.S. DOE

Public Hearings on Nv. Site Characterization

Mail Stop 551

P.O. Box 14400

Las Vegas, NV 89114

Dear Sir or Madam:

I am hereby requesting permission to speak
at your Thursday, March 31 public
hearing in Reno.

Thank you,

Kristin Pfankuch

(KRISTIN PFANKUCH)

NSC-27

Dear Sirs,

I would like to request some time on the floor at the Scopings Hearings in Reno, March 31st.

I have been a Nevada resident for the last five years and am interested in the welfare of this state. I appreciate your efforts and hope you will appreciate mine.

Thank you,

Jim Buckley

No address shown on envelope
or letter.

NSC-26

Dear Sir,

Please
add my name to
your list of people
to be notified of
"Waste Storage at
NTS," hearing?

Thank you.

Thomas Bealbert
2305 Demetrius
Las Vegas, Nev. 89101
NSC-25 649-4742

3-15-83

DEAR SIRS

WOULD IT BE POSSIBLE TO PARTICIPATE IN THE
PUBLIC HEARING ON NEVADA SITE CHARACTERISTICS
3-30-83 9AM TO 5PM UNLV BALLROOM.

I WILL REPRESENT THE AMARGOSA VALLEY
WATER USERS ASSOCIATION. I OWN 2680 ACRES,
GROW ALFALFA, AM A REGISTERED PROFESSIONAL
ENGINEER, FALLOUT SHELTER ANALYSTS, MEMBER
OF AMERICAN SOCIETY OF AGRICULTURAL ENGINEERS,
HAVE BS IN PROD. MGMT, MS IN SYSTEMS MGMT.

I PREFER LISTENING TO ALL THE QUESTIONS AND
ANSWERS SO THAT I CAN ELIMINATE ANY OF MY
QUESTIONS THAT HAVE BEEN ANSWERED.

I HAVE HAD SECURITY CLEARANCES AND BEEN
SECURITY MONITOR SO THAT I UNDERSTAND
LINES OF QUESTIONING THAT SHOULD NOT BE
PURSUED. THE BETTER INFORMED THAT I AM,
THE BETTER QUESTIONS I WILL ASK.

WITH SO MUCH INFORMATION TO IMPART TO A
POPULATION WITH A WIDELY DIVERGENT DATA BASE
FOR REFERENCE I SYMPATHIZE WITH YOUR
PROBLEM. YOUR PRESENTATION MATERIAL
WILL BE EXCELLENT BUT THE PUBLIC DISCUSSION/
QUESTIONS COULD LEAD TO AUDIENCE CONFUSION.

I WILL IDENTIFY SPECIFICS ^{THAT} MAY NEED CLARIFICATION.
I DON'T MEAN TO PRESUME BUT WOULD AIM
AT OBTAINING THE MAXIMUM INFORMATION
AVAILABLE ON 3-30-83

THANK YOU
James E. Owen

JAMES E. OWEN NSC-24
RANCHO AMARGOSA
RT 15 BOX 518
AMARGOSA VALLEY NV 89020

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: Judy Michelson

DATE: March 14, 1983

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
Myself, Family & Friends. Thank you.

Judy Michelson
2101 Pine Ridge Drive
Reno, Nevada 89509

NSC - 21

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: LIZ BERNHEIMER

DATE: March 14, 1983

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of

SELF

. Thank you.

Health Professions for Nuclear
UN School of Medicine awareness

Liz Bernheimer

UNR D (OFFICE OF DEAN)

Reno, NV 89557-0046

NSC - 22

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: MAYA MILLER

DATE: 3/15/83

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of

Myself

. Thank you.

MAYA MILLER

6185 FRANKTOWN RD

CARSON CITY, NV 89701

NSC - 23



RICHARD H. BRYAN
GOVERNOR

JAMES I. BARNES
DIRECTOR

STATE OF NEVADA
DEPARTMENT OF ENERGY

400 W. KING STREET, ROOM 106
CARSON CITY, NEVADA 89710

(702) 885-5157
March 15, 1983

DIVISIONS
CONSERVATION AND PLANNING
RESEARCH AND DEVELOPMENT

U. S. Department of Energy
Public Hearings on Nevada Site Characterization
Atten: Presentation Schedule
Mail Stop 555
Post Office Box 14400
Las Vegas, Nevada 89114

Dear Sir:

Please be advised that the Nevada Department of Energy is requesting, on behalf of the Governor of State of Nevada, the opportunity to provide oral presentation at the public hearings scheduled for March 30, 1983 in Las Vegas and March 31, 1983 in Reno.

Further, we are specifically requesting to make the first presentation on each of those days. The presentation at the Las Vegas hearing will be made by Robert R. Loux and the presentation at the Reno hearing will be made by James I. Barnes.

Your consideration of this request will be greatly appreciated.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert R. Loux", written over a horizontal line.

Robert R. Loux
Administrator
Division of Research and
Development

RRC:eb

NSC-20

Judy Treichel
4491 Balsam Street
Las Vegas, Nevada 89108
(702) 645-3035
March 17, 1983

USDCE, Public Hearing on
NV Site Characterization
Mail Stop 555
P. O. Box 14400
Las Vegas, Nev. 89114

I am formally requesting time to speak at the public hearing in Las Vegas on March 30, 1983 on radioactive waste. I will speak on behalf of myself.

Thank you,


Judy Treichel

NSC-19

March 6, 1983

U.S. Department of Energy
Public Hearings on Nevada Site Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, NV 89114

Sirs:

The League of Women Voters requests
time to speak at the Site Characterization
Plan guidelines hearing in Las Vegas
on Wednesday, March 30, 1983, at
the University of Nevada, Las Vegas.

Yours truly,
Ann A. Zorn
Natural Resources Committee

LWV
1591 GABRIEL DR
LAS VEGAS, NV 89109

League of Women Voters

NSC-18



Citizen Alert

AN ALTERNATIVE INFORMATION SOURCE FOR NEVADANS

P.O. Box 1681
Las Vegas, Nevada 89101

P.O. Box 5391
Reno, Nevada 89513

March 16, 1983

U.S. Department of Energy
Public Hearings on
Nevada Site Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, NV 89114

Dear Sirs:

Citizen Alert wishes to make an oral presentation at the public hearing Wednesday, March 30.

Sincerely,

Bill Vincent
Bill Vincent
Southern Coordinator
382-5077

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114
FROM: SYM O. MORRIS DATE: # 3/14/83

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
Member - N.A.A.V. . Thank you. Sym O. Morris

14090 Tourmaline Drive
Reno, Nevada 89511

Sym O. Morris
NSC-14

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114
FROM: Cynthia K. Mitchell DATE: 3/15/83

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
myself . Thank you. Cynthia K. Mitchell

1101 Washington
Reno Nevada
89503

NSC-15

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114
FROM: 10:00-11:00 am DATE: 3/14/83

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of
Citizen Alert . Thank you.

JOSEPH H. ROBERTSON
920 EVANS AVE.
RENO, NEVADA 89512

JH Robertson

NSC-16



Department of Energy
Nevada Operations Office
P.O. Box 14100
Las Vegas, NV 89114-4100

*Filed because
of marginal
notes.*

March 15, 1983

Peggy Weaver, REECO, Las Vegas, NV

ADDITIONS TO MAILING LISTS - NUCLEAR WASTE HEARINGS

Abby Johnson, Nevada representative for Citizen Alert, requested the following names be added to the subject mailing list. Ms. Johnson's list was conveyed while in attendance at the public hearing on the national Guidelines, March 14, 1983, in Salt Lake City, Utah.

Peggy Twedt
League of Women Voters
500 W. Telegraph
Carson City, NV 89701

AB

*mailed from Es office
per Paul*

Ann Zorn
League of Women Voters
1591 Gabriel Drive
Las Vegas, NV 89109

AB

Glenn Miller, President
Toiyabe Chapter Sierra Club
1850 Prior Rd.
Reno, NV 89503

AB

Barry Crain
Advocates for Future Generations
245 Gentry Way
Reno, NV 89502

AB

Liz Bernheimer
Health Professionals
For Nuclear Awareness
1401 Earl Drive
Reno, NV 89503

AB

Bob Fulkerson, Chairman
Progressive Student Alliance
215 E. 7th St. #6
Reno, NV 89501

AB

NSC-13

Peggy Weaver

-2-

Larry Fleming (private citizen) *1/1*
401 College Dr. #106
Reno, NV 89503

Paul Bottari *Mail book*
Nevada Cattlemen's Assoc.
419 Railroad
Elko, NV 89801

Judy Treichel (new Citizen Alert Bd. Member) *1/22*
4491 Balsam
Las Vegas, NV 89108

Don Springmeyer (new Citizen Alert Bd. Member) *1/22*
6028 C. Plumas
Reno, NV 89509

PMBD:AJR-362

Allen J. Roberts
Allen J. Roberts
Special Projects Branch



Department of Energy
Nevada Operations Office
P.O. Box 14100
Las Vegas, NV 89114-4100

*only one number
assigned per Plan.*

March 15, 1983

Peggy Weaver, REECo, Las Vegas, NV

ADDITIONS TO MAILING LISTS - NUCLEAR WASTE HEARINGS

Abby Johnson, Nevada representative for Citizen Alert, requested the following names be added to the subject mailing list. Ms. Johnson's list was conveyed while in attendance at the public hearing on the national Guidelines, March 14, 1983, in Salt Lake City, Utah.

Peggy Twedt
League of Women Voters
500 W. Telegraph
Carson City, NV 89701

Ann Zorn
League of Women Voters
1591 Gabriel Drive
Las Vegas, NV 89109

Glenn Miller, President
Toiyabe Chapter Sierra Club
1850 Prior Rd.
Reno, NV 89503

Barry Crain
Advocates for Future Generations
245 Gentry Way
Reno, NV 89502

Liz Bernheimer
Health Professionals
For Nuclear Awareness
1401 Earl Drive
Reno, NV 89503

Bob Fulkerson, Chairman
Progressive Student Alliance
215 E. 7th St. #6
Reno, NV 89501

NSC-13

Peggy Weaver

-2-

Larry Fleming (private citizen)
401 College Dr. #106
Reno, NV 89503

Paul Bottari
Nevada Cattlemen's Assoc.
419 Railroad
Elko, NV 89801

Judy Treichel (new Citizen Alert Bd. Member)
4491 Balsam
Las Vegas, NV 89108

Don Springmeyer (new Citizen Alert Bd. Member)
6028 C. Plumas
Reno, NV 89509


Allen J. Roberts
Special Projects Branch

PMBD:AJR-362

TO: USDOE, Public Hearing on NV Site Characterization, Mail Stop 555,
P. O. Box 14400, Las Vegas, NV 89114

FROM: STEVE BLOOMFIELD MD

DATE: 3/13/83

I am formally requesting time to speak at the public hearing in
Reno on March 31 on radioactive waste. I will speak on behalf of

CITIZEN ALERT AND
PHYSICIAN FOR SPECIAL
RESPONSIBILITY

. Thank you.

STEVE BLOOMFIELD MD
373 W. ALROYO
RENO, NEVADA 89509

NSC-12

MAIL STOP 555
P.O. BOX 14400
LAS VEGAS, NEV 89114



AMERICAN WAREHOUSING INCORPORATED

WAREHOUSING AND DISTRIBUTION

P. O. BOX 4364
4501 MITCHELL STREET
NORTH LAS VEGAS, NEVADA 89030
• TELEX 684-433

TEL 702-644-1034

March 14, 1983

U. S. Department of Energy
Public Hearings on Nevada Site Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, NV 89114

Gentlemen:

While there are many opponents to the principle of storing used nuclear waste in all parts of the country, it is necessary that some site for this storage be found.

Having visited the Nevada Test Site, it is fair to state that every effort has been expended to make disposal sites safe.

Many opponents do not want to admit that disposal sites throughout the world are being used at present and such locations must be chosen in the United States as well. If no state will accept such disposal, what is to be done with the rubbish presently being generated in this country.

Certainly a remote area such as Yucca Mountain is as remote from densely populated areas as can be found and with the proper restraints and supervision can be safely used.

The only danger that exists is that the best engineering "know-how" is not followed or supervised.


Providing this technology is carefully employed, there should be no greater hazard in handling spent fuel than in putting out a fire or controlling an oil spill.

Certainly Nevada will not be the only storage site for Nuclear Waste, and we can only support the concept that it must do it's share to cooperate nationally.

We sincerely hope that this vote of confidence in a carefully controlled program will be of help.

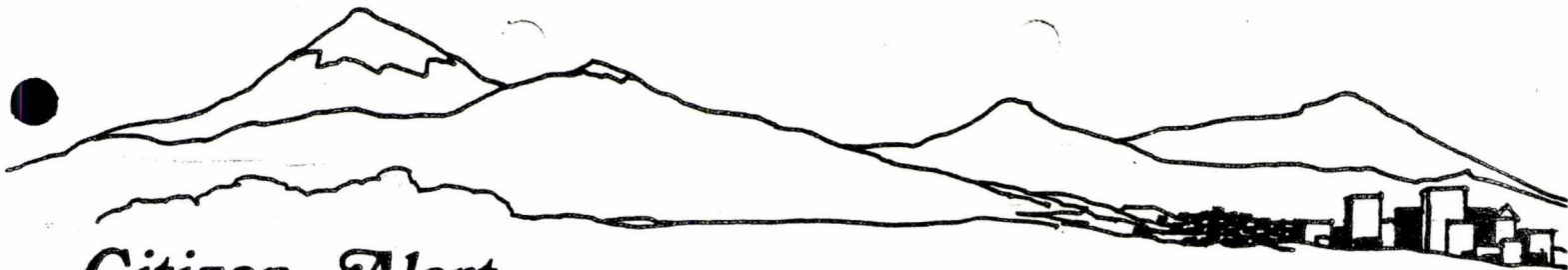
Sincerely,

AMERICAN WAREHOUSING, INC.


S. Everett Perlberg
Chairman of the Board

SEP/fd

NSC-11



Citizen Alert

AN INDEPENDENT INFORMATION SOURCE FOR NEVADANS

P.O. BOX 5391

RENO, NEVADA 89513

(702) 786-4220

P.O. BOX 1681

LAS VEGAS, NEVADA 89101

(702) 382-5077

BOARD OF DIRECTORS

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Reno, Nevada

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Washoe Valley, Nevada

JON WELLINGHOFF
Reno, Nevada

STAFF

ABBY JOHNSON
Reno Office

MARLA PAINTER
Reno Office

BILL VINCENT
Las Vegas Office

P.O. Box 5391
Reno NV 89513
March 12, 1983

USDOE
Public Hearing on NV Site Characterization
Mail Stop 555
P.O. Box 14400
Las Vegas, NV 89114

Dear Sir or Madam:

Please consider this a formal request to speak at the March 31 Scoping Hearing in Reno. I will speak on behalf of Citizen Alert, and would like to reserve the full time allotted to me. I would prefer to speak in the early afternoon, but will attend the entire hearing.

Please contact me at our Reno office if there are questions, problems, or changes. Thank you.

Very truly yours,

Abby Johnson

NSC-10

J. F. ROBINSON
710 ROBIN STREET
RENO, NEV.
89509



US DOE
Public Hearing on
New Site Characterization
mail Stop 555
P.O. Box 14400
Las Vegas, NV 89114

Dear Sirs:

This is to request "permission"
to speak at the March 31 meeting
to be held in Reno at UNR re
the so called "site characterization".
If you have a syllabus printed
or available - please send one to:

TAXPAYER JERRY ROBINSON
710 Robin St
Reno NV 89509

NSA

KATHARINE GARDNER HALE
1101 KEYSTONE AVENUE
RENO, NEVADA 89503



US DOE
Mail Stop 555, P.O.B. 14400
Las Vegas
Nevada
89114

3101983

Dear Doe,

I am formally requesting
time (7-10 minutes) to speak at
the public hearing in Reno on
March 31 (concerning radio-
active wastes). I will speak on
behalf of myself as a citizen.
Please schedule me in the A.M.
(10 A.M. to 1 P.M.) session.

Thank You, KGH
NSC-8

STATE OF NEVADA
DEPARTMENT OF COMMERCE

NYE BUILDING, ROOM 321
201 S. FALL STREET
CARSON CITY, NEVADA 89710
(702) 885-4250

DIVISIONS
CONSUMER AFFAIRS
FINANCIAL INSTITUTIONS
FIRE MARSHAL
HOUSING
INSURANCE
MANUFACTURED HOUSING
REAL ESTATE
UNCLAIMED PROPERTY

RICHARD H. BRYAN
GOVERNOR

LARRY D. STRUVE
DIRECTOR

March 10, 1983

Nuclear Waste Hearings
U.S. Department of Energy
Mail Stop 555
P. O. Box 14400
Las Vegas, Nevada 89114

Dear Sirs:

I am in receipt of your March 2, 1983 DOE News, and would be interested in obtaining more information about the high level waste hearings, specifically the hearing scheduled for Reno on March 31, 1983. Please place my name on your notification list, and send all available information to:

Larry D. Struve, Director
Department of Commerce
201 South Fall Street
Room 321
Carson City, Nevada 89710

Thank you for your prompt attention to this matter.

Sincerely,

Larry D. Struve

LARRY D. STRUVE
Director

dl

*Already on list
P.W.*

NSC-7
0-1430-C014



ROBIN JENKINS, M.A.

WRITER

4494 El Cebra
Las Vegas, NV 89121
(702) 456-0791

United States Department of Energy
Environmental Assessment for Nevada Site Characterization
Mail Stop 555, P.O. Box 14400
Las Vegas, NV 89114

To Whom it may Concern:

We Nevadans do not want a high level radioactive waste repository anywhere in the state. We are outraged that the low-level radioactive dump at Beatty has been allowed to operate as long as it has. Furthermore, we object to the military radioactive dumping grounds and insane testing that takes place in this state. Take your poisons and your weapons away. The voice of sanity will make itself heard over the voice of destruction. Go away.

Sincerely,

Robin Jenkins

Robin Jenkins

VSC-6



UNIVERSITY OF NEVADA RENO

Nevada Bureau of Mines and Geology
University of Nevada Reno
Reno, Nevada 89557-0088
(702) 784-6691

7 Mar 83

Nuclear Waste Hearings
U.S. Department of Energy
Mail Stop 555
P. O. Box 14400
Las Vegas, NV 89114

Please place my name on the notification list for Nuclear Waste Hearings.
My address is:

John Schilling, Director
(at above address).

A handwritten signature in cursive script that reads "John Schilling".

John Schilling
Director/State Geologist

JS:hm

Already on List #2.

VSC-5



Department of Energy
Nevada Operations Office
P. O. Box 14100
Las Vegas, NV 89114-4100

March 9, 1983

Peggy Weaver, REECo, Las Vegas, NV

ADDITIONS TO MAILING LISTS - NUCLEAR WASTE HEARINGS

The following individuals in attendance at the local Sierra Club chapter meeting on March 8, 1983, requested their names be added to the subject mailing list.

Cheri Cinkoske
816 Lillis
North Las Vegas, NV 89030

Martin Einert
309 Yuma Ct.
Boulder City, NV 89005

Julie Christensen
1624 Palm Avenue #315
Las Vegas, NV 89104

A. J. Stevens
Post Office Box 19776
Las Vegas, NV 89132

PMBD:AJR-360


Allen J. Roberts
Special Projects Branch

last # 1

NSC-4

Please send info
on hearing on
Nuclear waste dump
for 3/30:
to:

Scriptmist Inc
of Greater Las Vegas

Las Vegas
2009 Wynnport
Las Vegas, Nev

89104

NSC-2

8 March 1983

Please rush information concerning
the upcoming hearing on the nuclear waste
dump in Nevada to:

Teri Goth
2375 E. Callahan
Las Vegas, NV 89119

also, I need deadline date.

Teri L. Goth
NSC-3 Goth



RICHARD H. BRYAN
GOVERNOR

STATE OF NEVADA
STATE OFFICE OF COMMUNITY SERVICES
CAPITOL COMPLEX
CARSON CITY, NEVADA 89710
TELEPHONE (702) 885-4420

LINDA A. RYAN
DIRECTOR

March 4, 1983

Nuclear Waste Hearings
U.S. Department of Energy
Mail Stop 555
P.O. Box 14400
Las Vegas, Nevada 89114

Dear Sir/Madam:

Please put our agency on the notification list concerning the establishment of a permanent national repository for high-level radioactive wastes.

Sincerely,

A handwritten signature in cursive script that reads "John B. Walker".

John B. Walker
Senior Planner

JBW/kf

1100 E. Quins Ste 109
CC 89710

NSC-1

04405-00402

R