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1 Larsons, and I'm director of the White Pine
 2 County Nuclear Oversight Office here in
 3 White Pine County, and I've got comments
 4 for the record. Basically these are taken
 5 from the executive summary of our White
 6 Pine County Impact Report which was
 7 submitted to the Secretary of Energy
 8 approximately a month ago.

9 The Nuclear Waste Policy Act of
 10 1982 created a program designed for the
 11 management and disposal of high-level
 12 nuclear waste and spent nuclear fuel. In
 13 1987 Congress amended the act leaving Yucca
 14 Mountain as the sole area to study for the
 15 development of a nuclear waste repository.

16 If recommended by the Secretary of
 17 Energy, nominated by the President to the
 18 congress and authorized for construction
 19 and operation by congress, the Yucca
 20 Mountain repository system will have been
 21 unilaterally imposed on the residents of
 22 Nevada along with its attendant
 23 concentration of risk.

24 While arguably necessary, the
 25 program has long since lost any concept of

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1 fairness or equity with respect to the
 2 residents of Nevada. All other states and
 3 the U.S. Government, who have benefited
 4 from the creation of this waste, will have
 5 all associated risk irrevocably transferred
 6 to the State of Nevada and its residents.

7 In this regard, the Yucca Mountain
 8 repository program represents a unique and
 9 unprecedented unilateral transfer of risk.

10 Within Nevada, the necessity to
 11 protect the State's gaming-based tourist
 12 economy will result in shipments of spent
 13 nuclear fuel and other high-level
 14 radioactive waste moving through rural
 15 locations such as White Pine County. Very
 16 simply, the largest concentration of
 17 long-lived extraordinarily dangerous
 18 high-level nuclear waste in recorded

19 history will be transported through rural
20 Nevada and stored in perpetuity at Yucca
21 Mountain, presuming the site is found
22 suitable.

23 The Yucca Mountain repository
24 system represents an unwanted industrial
25 activity. The allocation of Nevada's

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1 natural, social, fiscal and economic
2 resources required to support the location
3 and operation of the repository system
4 represents an opportunity cost as these
5 same resources will be unavailable for
6 allocation in support of other desired
7 industrial activities.

8 Since 1992 when White Pine County
9 received status of Affected Unit of Local
10 Government, the County's nuclear waste
11 project office and the White Pine County
12 Board of Commissioners have commissioned a
13 series of independent studies from
14 respected researchers at technical
15 consulting firms as well as academic
16 institutions. The independent studies were
17 designed to inform the residents of White
18 Pine County on the range of impacts that
19 might be expected if the State of Nevada
20 designates a legal-weight truckroute
21 through White Pine County.

22 The findings indicate that the
23 impacts for White Pine County are highest
24 in the areas of emergency management,
25 highway accident risk, radiation exposure

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1 risk, and from stigma that may reduce the
2 desirability of White Pine County as a
3 place to live and as a destination for
4 tourists.

5 Within the Draft Environmental
6 Impact Statement for the Yucca Mountain
7 Repository, the DOE has provided only
8 cursory analysis of the risks inherent in
9 transportation of quantities of highly
10 radioactive spent nuclear reactor fuel and
11 high-level waste on an unprecedented
12 nationwide scale over a very long period of

13 time.
 14 The limited transportation analysis
 15 performed for the DEIS was often based on
 16 grossly outdated or simplified demographic
 17 and physical data, even though up-to-date
 18 information of this type was readily
 19 available. A rationale for this approach
 20 is very difficult to understand, but has
 21 the effect of trivializing or grossly
 22 underestimating the real risks associated
 23 with transportation of high-level waste.

24 Transportation incidents and
 25 accident-related impacts resulting from the

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1 presence of the Yucca Mountain Repository
 2 are both wide-reaching and potentially
 3 devastating to the residents of White Pine
 4 County, its economy, and society. They are
 5 well beyond anything identified by the DOE
 6 in its Yucca Mountain DEIS.

7 Regrettably, we will not have
 8 sufficient opportunity under the DOE's
 9 current schedule to review the final EIS
 10 prior to issuance of the potential site
 11 recommendation to determine if their final
 12 assessment of impacts approaches those we
 13 have identified. Further, we will not know
 14 with certainty until a much later time
 15 frame as to whether spent nuclear fuel and
 16 high-level waste destined for the Yucca
 17 Mountain Repository will, in actuality, be
 18 transported through White Pine County.

19 Further, the Department of Energy
 20 has, to date, completely ignored
 21 socioeconomic and stigma-based effects of
 22 the repository program on the economy and
 23 society of the residents of White Pine
 24 County. Many people living in White Pine
 25 County have direct personal experience with

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1 the societal effects of radiological
 2 exposure as downwinders from Nevada Test
 3 Site atmospheric testing of nuclear
 4 weapons.

5 To represent through silence that
 6 there are no socioeconomic or societal

7 effects from a program that has the
8 potential to subject citizens and the
9 environment to exposure from radioactive
10 waste is difficult for White Pine County
11 residents to accept.

12 The result is that the Department
13 of Energy has so far represented to the
14 Congress, the administration, the State of
15 Nevada, and the affected units of local
16 government that the overall risk implicit
17 in the transportation to and storage in
18 perpetuity of high-level nuclear waste at
19 Yucca Mountain represents minimal and
20 statistically acceptable risk and is
21 completely manageable. We believe this
22 conclusion is disingenuous and based on
23 flawed, incomplete analysis and/or simply
24 failure to consider certain impacts of the
25 program. Consequently, we strongly

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1 disagree with the DOE findings thus far.

2 Rather we feel that there is
3 significant risks of unanticipated
4 consequences inherent in the Yucca Mountain
5 repository program. When viewed in
6 totality, the risks in an overall sense
7 appear unmitigable through any reasonable
8 means.

9 It will be very difficult for the
10 nation to transfer its nuclear waste risk
11 to Nevada without diminishing the health,
12 safety, and welfare of the State's
13 residents and visitors. It is our view
14 that these impacts can only be fully
15 mitigated by not going forward with the
16 Yucca Mountain Repository Program. That is
17 our fundamental conclusion.