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BJORN SELINDER: For the record, my name is

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QA:NA

15 Bjorn Selinder. I'm the Churchill County Manager.

16 This represents the testimony of Churchill

17 County for the public hearings which have been scheduled

18 for both today, September 5, and for September 12 --

19 forgive me, I just noticed -- let's back up -- October.

20 I don't know why I had September, and I'll change that

21 and submit it again, for October 5 and 12, 2001.

22 The U.S. Department of Energy is faced with a

23 formidable task in determining the suitability of Yucca

24 Mountain as the nation's first underground geologic

25 repository. Storage of the nation's spent nuclear fuel

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1 and high-level nuclear waste must ensure long-term

2 isolation without necessarily relying upon future

3 institutional or governmental control.

4 Yucca Mountain today remains extremely

5 unpopular among a majority of Nevadans. It's probably

6 one of the largest, most unpopular federal projects ever

7 conceived in that no state wants to host such a facility.

8 It is in effect a solution for many areas of the country

9 and yet another contribution to Nevada's long and

10 disproportional burden as host for many of the nation's

11 nuclear-related programs.

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12 Beginning some 50 years earlier with the
13 weapons testing program and continuing today as one of
14 the country's larger storage facilities for low-level
15 radioactive wastes, the Nevada Test Site has become a
16 large dumping ground. During the weapons testing
17 program, historical accounts portray Nevada's sense of
18 purpose and obligation as this country raced for nuclear
19 supremacy over its Cold War enemies. That sense of
20 obligation and purpose was reduced to political
21 convenience with the passage of the 1987 Nuclear Waste
22 Policy Amendments Act that targeted Yucca Mountain as the
23 only site to be studied for a geologic repository.

24 Although DOE has spent some 15 years studying
25 Yucca Mountain, we remain concerned about recent

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1 activities that appear to have more focus on meeting
2 politically-imposed schedules than determining without
3 question Yucca Mountain's ability to isolate dangerous
4 materials.

5 Still today the project does not have a final
6 design. Instead, DOE wants to continue to rely upon what
7 has been conveniently termed flexible design concepts and

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8 boundary analysis in attempts to quantify unknowns and
9 uncertainties about repository performance. There remain
10 uncertainties associated with high thermal load designs
11 and the ability of engineered barrier systems to contain
12 waste over the regulatory period of compliance.

13 As originally envisioned, the Yucca Mountain
14 host rock was supposed to isolate waste from the human
15 environment. Instead, we now have a repository that
16 relies almost entirely on manmade barrier systems to
17 contain wastes.

18 DOE insists on or is being forced into moving
19 forward when there is no conclusive evidence with regard
20 to waste package performance, particularly with respect
21 to waste package corrosion rates. At best, DOE can only
22 claim that expert solicitation or what is otherwise known
23 as an informed opinion finds no reason to believe the
24 waste packages would fail or, more importantly, fail
25 prematurely, resulting in a release of radioactive

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1 materials.

2 With the acknowledgment that the repository
3 rock cannot by itself contain wastes, the public and,
4 more importantly, the public in Nevada is asked to place

5 their confidence in a host of models that are supposed to
6 predict repository performance for a period of at least
7 10,000 years into the future. The use of models add yet
8 another layer of uncertainty. It has now become a
9 question of when and how much radiation will reach the
10 accessible environment.

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11 These few examples clearly support the notion
12 that DOE is not ready for a site recommendation. We do
13 not believe that DOE has met the threshold needed to
14 ensure the long-term isolation of spent nuclear fuel and
15 high-level nuclear waste. The site recommendation should
16 be postponed until such time that DOE has developed a
17 firm proposal for the repository design and can provide
18 supportable evidence without the somewhat long list of
19 uncertainties and unknowns currently associated with the
20 characterization program and the ability to model future
21 performance.

22 In closing, I would also note that according
23 to DOE, the repository is capable of being built and
24 operated without substantial risk to the public. In
25 fact, the Yucca Mountain draft EIS may well suggest that

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1 the transportation component poses the greatest exposure

2 risk, yet the DOE fails to provide a comprehensive
3 national transportation proposal for waste shipments to a
4 repository.

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5 For example, I believe that the DOE draft EIS
6 showed that rail transportation of waste would be overall
7 safer than truck, but there is no policy recommendation.
8 It may, in my opinion, be a mistake to allow individual
9 generator sites and even states to select what will
10 become the most politically acceptable modes and routes
11 for repository shipments. We may ultimately develop a
12 spider-web network of routes passing through all areas of
13 the country that results in even greater risks, higher
14 costs, and a less efficient and reliable transportation
15 program.

16 Thank you for the opportunity to comment.