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Public Comment to All NWTRB members
On US NWTRB Panel on Post Closure Performance
March 14, 2007 – held in Berkeley, California (transcript)

Nine billion dollars have been spent, and the government will owe 7 billion in damages to nuke plants even if the repository opens in 2017 at the earliest. Plus 2 million paid to redo data because of signs of fraud. According to Mathew Wald (in Wall Street Journal), companies want to build new reactors and DOE wants to put more than the allotted 70,000 metric tons into Yucca – (a second site is going to be hard to find). When is anybody going to look at the real thing and say – “it just plain isn’t going to work! – too many uncertainties!”

Soil tests and bedrock are of great interest. Way back when the pad for dry cask storage at the Palisades Plant in Michigan was built, they used the environmental impact statement for the reactor site (on bedrock) for the pad site – as if it were the same. Fact is, the pad is on sand dunes and no soil testing was done before it was put there. People there, including a former NRC employee as I understand it, are still fighting that issue. Are you doing the same sort of thing at Yucca Mountain? Scott Tyler’s public comment, at the end of the panel, offering his students to go around the mountain and use a hammer and stick and measure soil depth to bedrock amazed me. Why hasn’t this already been done? When will it be done?

And the whole idea of “averages” and “means” will do nothing to predict a “dumping” rainfall event and its ramifications on corrosion and temperature in the future. Elevation apparently has a lot to do with how these measurements should have been used. Why wasn’t this a concern before?

Man made climate change is coming. Nobody disputes that any more. We can’t predict the future from the past, and it sounds like they still don’t even have a good grip on real infiltration processes at Yucca Mountain at this late date. The recharge factor keeps changing too. Are the fractures filled with calcium, with soil, or open – who knows? The e-mail quotes on pp. 269-like, “These guys are trying to put band aids on a road kill. They don’t get it. The more they start digging, the more dangerous it starts to get. There are many skeletons in the closet” – You see a culture of discouragement here. And when there are deadlines to produce a product, that’s when things are “glossed over”, “left out”, fudged a little”, etc., and this can all be done easily with modeling. Good hard factual data is needed more and more. I applaud the Board once again for asking the tough questions about the uncertainties, the monitoring policy, and accurate basis for testing results and how used in models. Keep at it! The “cultural” attitude of QA has got to be cured all across the board and repeated over and over. That’s where cask designs faltered frequently. It has to be clear.

Mr. Elzeftawi is right – science and politics do mix and the nuclear industry wants Yucca Mountain licensed yesterday. If there are modeling problems as bad as they appear, make them take the time at DOE to do things right. Real testing, Real monitoring, Real data is needed. And there isn't time to clear up this mess to meet any licensing deadlines. So hold off! The jury is still out on the thermal process – where do we stand on this? If a Bayesian type of analysis is needed to get correct documentation in some areas – then they need to do this. Infiltration appears to get higher and higher. What is the truth? A model is only as good as the data put into it, and if you can't back up your assumptions – it's worthless. We seem to be getting less and less of a barrier, and the cask design to protect the waste is impossible as I see it. Integration has always been a problem with the whole waste system – there is a real lack here in way too many aspects.

I recently watched the movie “Fat Man and Little Boy” again and I see Paul Newman as General Groves saying they have to use the bomb because they spent so much money. He hides documents about the Germans being behind; he hides the petition not to use the bomb. Are you going to allow the repository because of the money spent? Don't!

Thank you.

Fawn Shillinglaw