Mr. Chairman and members of the panel, my name is Geri Ann Stanton and I am here today representing Lincoln County, the City of Caliente, and their Joint City/County Impact Alleviation Committee. The County, City and their committee appreciate the opportunity to address the panel concerning environmental and public health issues regarding the proposed repository at Yucca Mountain.

As one of three units of local government designated by the Secretary of Energy as potentially affected by the proposed repository, Lincoln County has sought to understand the negative and positive implications of the project upon local area residents. Although Lincoln County is geographically dislocated from the repository site, the county is characterized by a long history of interrelationships with federal nuclear activities at the Nevada Test Site.

Many of the existing residents of the county have personally witnessed the above-ground weapons tests conducted at Yucca Flats. Because area residents do not feel they were properly warned of the exposure risks associated with such tests, distrust of the federal government runs high in Lincoln County. Recent surveys of City of Caliente residents sponsored by the Nevada Nuclear Waste Projects Office found that thirty
percent of those surveyed were not at all confident that the federal agencies would provide honest and accurate information concerning the Yucca Mountain Project. Thirty-six percent of survey respondents were extremely concerned that the repository might have harmful effects on health and safety.

It is with this measure of skepticism about the federal government that area residents and decision-makers tend to view the repository program. The DOE and other federal agencies involved with the repository program must go to extreme ends in order to re-establish an element of trust by local residents in the proposed repository program. Such trust is a prerequisite to local acceptability of the need for and purported safety of such a facility.

DOE is presently considering the use of the Union Pacific mainline through Lincoln County as a mode to transport radioactive waste to Yucca Mountain. In addition to the mainline, a circuitous rail spur through the county, which would by-pass the metropolitan Las Vegas area, is also being considered. Beyond technical and economic feasibility, Lincoln County believes that DOE should consider both the environmental and public health aspects of such a routing. There would seem to be obvious real and
perceived risk management benefits to keeping radioactive wastes out of the heavily populated Las Vegas Valley. While the costs of such a route may be high, so too may be the institutional benefits.

Lincoln County then encourages the Nuclear Waste Technical Review Board to help ensure that the repository program and related systems such as transportation, are as safe as is reasonably possible. The County recognizes the value of, and encourages full use of, engineered barriers to achieve maximum measures of safety and protection of the environment.

Lincoln County has recently learned that DOE has apparently exempted weapons tests from self-imposed radiological exposure limits for department facilities. The County is concerned that such specific exemptions unnecessarily place area residents at excessive risk. Further, such exemptions cast doubt regarding DOE's stated intent to protect the health and welfare of Nevada residents. The issue of agency credibility may very much be related to actions by DOE such as the noted exemptions to exposure limits.

It is important to obtain needed scientific information so as to allow a broad consensus of the suitability of Yucca Mountain as a repository. Timely completion of
such studies would serve to reduce much of the uncertainty and speculation about the site.

Further, the repository has resulted in political divisiveness which might be reduced if decisions about the suitability of the site were promulgated. In striving to obtain necessary site characterization data, DOE should not attempt to sidestep or have reduced any regulatory requirements governing protection of public health and environment. An obvious exception, are those requirements around which a broad scientific consensus for change develops.

Finally, Lincoln County would request that off-site meteorological studies and monitoring be established by DOE in order to establish the basis for predicting exposure pathways and exposure characteristics which might result from a transportation or repository accident. Such information would be helpful to emergency management planning activities concerning low probability-high consequence events such as volcanic eruption or a rail car fire involving a breached shipping container. A good historical record may be needed to accurately predict plume travel under alternate climatological conditions.

As I close my comments, allow me to note that I am not
a technical person. I would be happy to try and respond to questions, but may choose to defer some for written response from the County.

Thank you very much for the opportunity to present these comments.