

Citizens Advisory Board Idaho National Engineering and Environmental Laboratory

Yucca Mountain Preliminary Site Suitability Evaluation

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) has reviewed the Yucca Mountain Preliminary Site Suitability Evaluation and received the U.S. Department of Energy's invitation to provide public comment (letter dated August 28, 2001 and signed by Lake H. Barrett, Acting Director of the Office of Civilian Radioactive Waste Management).

As a panel of ordinary citizens providing consensus advice to the U.S. Department of Energy, the INEEL CAB is not in a position to assess the adequacy of scientific documentation related to Yucca Mountain nor to assess the suitability of Yucca Mountain as a national geologic repository. **The INEEL CAB can only reassert the urgent need for a national repository for safe disposal of the nation's spent nuclear fuel and high level radioactive waste**, in keeping with agreements and legally binding settlements that have been put in place based on the assumption that such a facility would be made available to support responsible management of wastes under DOE's stewardship.

The INEEL CAB strongly urges DOE to base its recommendation (whether or not to develop Yucca Mountain as the national geologic repository for spent nuclear fuel and high level radioactive waste) to the President on technical considerations.

The concerns expressed in INEEL CAB's consensus recommendation #66 (dated January 26, 2000, copy attached) are still valid and unresolved. Our primary concerns relate to:

- The waste acceptance criteria that will apply to waste streams that may be disposed in the geologic repository. We urge DOE to develop waste acceptance criteria for the national repository that will allow safe disposal of all spent nuclear fuel and high level radioactive waste under its stewardship.
- The capacity of the geologic repository. We urge DOE to construct the national repository in such a manner that will allow safe disposal of all spent nuclear fuel and high level radioactive waste under its stewardship.
- The schedule for closure of the repository. We urge DOE to establish a schedule for closure of the national repository on a schedule that will allow safe disposal of all spent nuclear fuel and high level radioactive waste under its stewardship.