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June 1, 2007

Mr. Timothy A. Frazier
GNEP PEIS Document Manager
Office of Nuclear Energy
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585-0119

Re: The U.S. Department of Energy's (DOE) Notice of Intent to Prepare a Programmatic Environmental Impact Statement (PEIS) for the Global Nuclear Energy Partnership (GNEP)

Dear Mr. Frazier:

Eureka County, Nevada, is an "affected unit of local government" under Section 116 of the Nuclear Waste Policy Act as amended. We are pleased to provide the following comments on DOE's January 4, 2007 Notice of Intent to Prepare a Programmatic Environmental Impact Statement for the Global Nuclear Energy Partnership.

Project description: The Draft PEIS must fully disclose and evaluate the full range of GNEP elements and components. As it is currently being described, GNEP would involve reprocessing of spent fuel from current U.S. reactors, new U.S. reactors that are being considered currently or contemplated in the future, U.S. defense sources, and reactors in foreign countries. In addition, the GNEP reprocessing facilities themselves will generate varied waste streams. The Draft PEIS must fully disclose the numbers and locations of any and all waste generator facilities. How much waste will there be? Where will it be processed? What types of waste and how much will be stored and where? What types and how much waste will be disposed of and where? What types of waste and nuclear material will be transported? From where to where? As part of this full accounting, the Draft PEIS must also disclose how much spent fuel from

abroad will be imported for reprocessing under GNEP. A full and complete description of the entire GNEP system is central to the Draft PEIS.

Impacts: DOE's Draft PEIS must realistically evaluate DOE's plans to send the long-lived radioactive nuclear waste products of the GNEP reprocessing plants to a repository, including a full examination of the waste streams and their environmental effects. The Draft PEIS should provide a detailed realistic accounting of the potential waste streams that would go into a repository.

Foreign reactor fuel: GNEP opens the possibility of waste from foreign reactors being transported to and within the United States, and also stored here. Does DOE intend to take spent fuel from foreign reactors? If so, how much? Where will it be stored? Will this be only U.S.-origin spent fuel or fuel of other origins as well? Does DOE contemplate sending the foreign waste to a U.S. repository? The Draft PEIS must make clear DOE's expectations on receiving foreign power reactor spent fuel and should factor that expectation into the GNEP option to be considered.

The Yucca Mountain connection: The Draft PEIS should fully and comprehensively assess the impact that disposal of unprocessed SNF and HLW at Yucca Mountain would have on the GNEP initiative since Yucca Mountain is currently designed to take spent nuclear fuel that could be reprocessed. In general, the Draft PEIS should address the full range of alternatives and ramifications of the GNEP program including the integration of the Yucca Mountain repository program for its pre-closure operations cycle.

Transportation: The Draft PEIS should address how DOE's current Transportation, Aging and Disposal (TAD) initiative will be compatible with GNEP. The Draft PEIS should pay special attention to the potential impacts on transportation and the cumulative impacts of all GNEP and related DOE shipments at the national, state, and local levels, including emergency response preparedness.

The Programmatic EIS is a first step in the process to consider whether GNEP is a feasible, practical proposal. It is important that the Draft PEIS fully address all aspects of the proposal from a systems approach and that it consider a range of alternatives for GNEP implementation, including what agency or organizations might be appropriate to manage the project.

Thank you for considering the comments of Eureka County, Nevada.

Sincerely,

Abigail C. Johnson
Nuclear Waste Advisor
cc: Ronald Damele, Eureka Public Works