

(For official public comment on EPA and NRC’s proposed revisions to their Yucca Mountain radiation release regulations)

To: EPA Docket Center (EPA/DC); Air and Radiation Docket; Environmental Protection Agency; EPA West, Mail Code 6102T; 1200 Pennsylvania Avenue, N.W.; Washington, DC 20460; Attention Docket ID No. OAR-2005-0083; and Secretary, NRC, Washington, D.C. 20555.

## **Protect Western Shoshone Indian Land at Yucca Mountain, Nevada from a Massively Leaking High-Level Radioactive Waste Dump!**

Whereas the U.S. Environmental Protection Agency (EPA) is responsible for setting the regulations for radiation releases from the proposed high-level atomic waste dump targeted at Yucca Mountain; and whereas the U.S. Nuclear Regulatory Commission (NRC) is responsible for enforcing those regulations; and whereas both EPA and NRC are mandated to protect public health and safety and the environment – not to cave in to pressures from the nuclear establishment in industry and government; and whereas high-level radioactive waste is among the deadliest of poisons humankind has ever created, remaining hazardous for hundreds of thousands to millions of years; therefore, we the undersigned demand:

- EPA’s and NRC’s proposed double standard be withdrawn that protects people for the first 10,000 years to currently applied standards of protection, but dooms future generations after that time to a 1 in 36 cancer rate (or even worse), and a 1 in 72 fatal cancer rate (or even worse). Such proposed cancer rates and fatal cancer rates are horrifying, and both agencies must withdraw such an unacceptable proposal. This is a complete violation of principles of inter-generational equity, justice, and morality.
- EPA’s and NRC’s proposed allowance for 350 millirem per year radiation doses to people living downstream from the leaking dump – the equivalent of about 58 full chest x-rays per year – will cause cancer, birth defects, and other maladies – as verified recently by the National Academies of Science Biological Effects of Ionizing Radiation (BEIR VII) report -- at alarming rates and must be withdrawn. Current standards of 15 millirem per year from all pathways, and 4 millirem per year from drinking water, must be applied for the full million year regulatory period. EPA must not set an expiration date on the Safe Drinking Water Act!
- Both agencies use of the “standard man” as their model “dose receptor” ignores the higher vulnerability to radiation of fetuses, children, women, subsistence farmers, the elderly, those with weakened immune systems, and Native Americans living a traditional lifestyle. These populations must be fully protected against radiation leaking into the environment.
- These proposed regulations are completely unacceptable and must not be allowed to set a precedent to be applied at other radioactively contaminated sites across the country because they represent a large-scale weakening of environmental and public health protection standards, vying for the worst such standards in the Western world, in violation of international norms.

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