Letters



and thus led to changes in performance assessment from one that depended primarily on rock to one that depended on engineered barriers—altogether a foolish strategy that began our problems with nuclear waste. Requiring a total systems approach is really a euphemism for "we picked the wrong rock."

Since the Topopah Spring tuff was chosen primarily on the basis of politics, it is not surprising that it would be such a poor rock with regard to performance—something we didn't fully realize until we had researched it for almost 20 years. Being a highly fractured, dual-porosity, variably saturated system that constantly drips oxidizing water, the necessity for numerous engineered barriers was obvious. This was the beginning of the rise in the final cost of the repository to the point where the NWF would not cover it and Congress will have to appropriate additional funds, more than would ever be in the NWF. This is highly unlikely.

As one of the original authors of the DOE Yucca Mountain license application to the NRC who worked on Yucca Mountain technically for 15 years prior to the application (especially on the engineered barrier systems), I can say that dependence on human-made engineered barriers is unwise and unnecessary given America's preponderance of massive Permian salt deposits, especially in the Delaware subbasin where the Waste Isolation Pilot Plant resides. The idea of retrieving spent nuclear fuel after it's buried is absurd and needs to be abandoned or we will never dispose of this material. And that might jeopardize seriously expanding our nuclear fleet in the future. But these issues do not impact whether we need a final repository to sustain our existing nuclear fleet. We don't . . . at least not for a long while. \otimes





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