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17 NOV 16 1999 MS. SWARTZ: My name is Ginger Swartz.
18 I represent the Office of the Governor, Nevada Agency
19 for Nuclear Projects. I'm here this afternoon on
20 behalf of Robert Loux, the executive director of that
21 agency.

22 In order for people to participate in the
23 National Environmental Policy Act (NEPA) process, they
24 must first be afforded the opportunity to know that a
25 major federal action has the potential to impact them

1 and their communities. While the U.S. Department of
2 Energy is conducting public hearings in various
3 communities in Nevada and around the country, DOE has
4 made no effort to inform citizens and public officials
5 of the relevance of the draft Environmental Impact
6 Statement to them and their states and communities.

1 7 [The notices of this public hearing, for
8 example, refer only to a draft EIS for a radioactive
9 waste repository at Yucca Mountain, Nevada. They do not
10 indicate that people in the Denver metropolitan area,
11 other parts of Colorado, Wyoming, and other western
12 states stand to be significantly impacted by thousands
13 of radioactive materials shipments as a direct result
14 of the Yucca Mountain program.

15 One can only conclude that such an
16 oversight is intentional and designed to suppress
17 public interest in the project and participation in
18 these public hearings.]

2... 19 [Nevada believes that DOE has violated NEPA
20 by concealing crucial information used in the draft
21 EIS. Absent this information, persons affected by the
22 transportation impacts of the proposed action have no
23 way of determining the substantive and legal
24 sufficiency of DOE's analysis. Such concealment of
25 crucial information can only diminish public confidence

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...2 1 in DOE's ability to safely transport these highly
2 radioactive materials.]

3... 3 [DOE contractors who prepared the draft EIS
4 actually selected specific routes for analysis using
5 the HIGHWAY and INTERLINE models. A draft EIS
6 reference even describes the procedures followed;
7 however, DOE decided not to reveal the actual highway
8 and rail routes used in the draft document, and the TRW
9 reference does not provide a written summary or maps of
10 the information provided to DOE on computer files.

11 The State of Nevada has sponsored a number
12 of routing studies over the past decade using the same
13 computer models as DOE's consultants. A 1994 study
14 prepared by the University of Nevada, Las Vegas
15 Transportation Research Center, indicates that if
16 Nevada does not designate preferred alternative routes
17 and DOE shipping contractors follow the quickest routes
18 consistent with federal regulations. The primary
19 east-west highway corridors would be I-80 from Ohio to
20 Utah, I-70 from Pennsylvania to Utah, and I-15 from
21 Utah to Nevada.

22 Using the shipment numbers in the draft
23 EIS and highway routing studies prepared by the UNLV
24 Transportation Research Center, the State of Nevada has
25 developed a preliminary estimate of potential

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1 legal-weight truck shipments through Colorado and
2 Wyoming to Nevada. Table I shows potential truck
3 shipments of SNF and HLW through Colorado and Denver on
4 I-70.

5 Under the mostly truck scenario, there
6 would be about 35,350 shipments through Denver over 39
7 years. Put another way, there would be an average of
8 2.5 truck shipments per day on I-70 through Denver
9 every day, seven days a week, for as many as 39 years.

10 Table II shows potential truck shipments
11 of SNF and HLW through Wyoming on I-80. Under the
12 mostly truck scenario, there would be about 27,600
13 shipments through Wyoming over 39 years. That would
14 mean an average of almost two truck shipments per day
15 through Wyoming on I-80 every day, seven days a week,
16 for 39 years.]

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17 [The draft EIS fails to evaluate the most
18 likely, and potentially heaviest impact, modal mix,
19 which is rail/truck/barge scenario for civilian SNF
20 shipments. The draft EIS mostly rail scenario
21 significantly misrepresents the extent to which
22 legal-weight truck shipments to the repository can be
23 reduced by unrealistically assuming major investment at
24 reactor sites and unprecedented and likely infeasible
25 use of heavy haul truck and barge transport.

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1 Nevada believes that the final EIS must
2 evaluate a transportation scenario based on the current
3 transportation capabilities of reactor and storage
4 sites.

5 Planning Information Corporation of Denver
6 developed a current capabilities transportation
7 scenario for the State of Nevada in September, 1996.
8 Under the PIC current capabilities scenario, 32 reactor
9 and storage sites in 19 states ship civilian spent
10 nuclear fuel to the repository by legal-weight truck.
11 These 32 sites account for about 35 percent of the
12 total civilian SNF inventory shipped to the repository.

13 Using the shipment numbers in the draft
14 EIS and the PIC mode and route assumptions, the State
15 of Nevada has developed a preliminary estimate of
16 shipments under the current capabilities scenario.
17 Table III indicates there would be almost 9,100 rail
18 shipments through Colorado and Wyoming over 39 years,
19 an average of about 4.5 cask shipments per week, every
20 week, for 39 years.

21 Almost all of the rail shipments would
22 follow the Union Pacific mainline from Gibbon,
23 Nebraska, to Salt Lake City through northeastern
24 Colorado and southern Wyoming. Shipments from at least
25 one reactor in Illinois would use the former Southern

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1 Pacific route through Grand Junction.

2 There would also be a considerable number
3 of legal weight truck shipments through Colorado and
4 Wyoming under the current capabilities scenario. Table
5 IV shows there would be about 12,660 shipments through
6 Colorado on I-70, an average of 6.2 shipments per week,
7 every week, for 39 years. Table V shows there would be
8 about 11,345 truck shipments through Wyoming on I-80,
9 an average of 5.6 shipments per week, every week, for
10 39 years.

11 PIC combined the current capabilities
12 modal assumptions with the most likely highway and rail
13 routes, using the same HIGHWAY and INTERLINE computer
14 models employed by DOE. A map showing these routes is
15 attached as Figure 1.

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16 The State of Nevada will be submitting
17 extensive written comments on this draft Environmental
18 Impact Statement for a high-level nuclear waste
19 repository at Yucca Mountain. [It is our hope that
20 these comments and those of all others will be
21 seriously considered, and that a reasonable No Action
22 alternative, as opposed to the unreasonable and
23 unrealistic ones contained in the draft document, is
24 selected as the preferred action in the final
25 Environmental Impact Statement.] Thank you.

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