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NOV 09 1999

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EIS000674

21 Mr. Halstead. If you would like to go back, I
22 know you had an eight point -- if you'd like to review briefly
23 1 and 2 to make sure that it all stays together.

24 MR. HALSTEAD: I haven't lost my place.

25 Thank you for the opportunity. I know the hour's

1 late and I'm sorry to keep you here, but there are some very
2 important things that I want to say for the record because I
3 haven't had an opportunity to come to Lincoln County and say
4 them as we have in past meetings with the local impact
5 committee. I'm glad people are still here today.

6 Now the real issue we need to focus on today is
7 this Draft Environmental Impact Statement and the way that it
8 deals with issues.

9 There are different views in this room on the
10 repository, heavy-haul trucks, intermodal transportation, rail
11 routes, et cetera and it's fine for people to give their
12 opinions, but this is a rare opportunity that you have to
13 direct specific comments to the Department of Energy, and I'll
14 try to stick with some facts.

1 15 First of all, the Draft Environmental Impact
16 Statement is deficient in its treatment of the safety aspects
17 of heavy-haul trucks.

18 If you use, for example, Nevada average accident
19 rates and the projected shipment miles for DOE's top Module 2
20 scenario and you look at the Caliente route, you come to the
21 conclusion that you've got a projection using those historical
22 numbers of about 24 accidents, 12 loaded, 12 unloaded over 39

23 years. There could be more, there could be less.

24 The point is when you start doing risk analysis,
25 you do a baseline, and if the historical trends hold into the
1 future, you can assume there will be accidents, and that's
2 assuming that the heavy-haul trucks are as safe as other
3 traffic.

4 So I don't see any basis in the DEIS. There's no
5 empirical evidence to support their conclusion quote that the
6 accident risks are low for all five route alternatives.

7 If you agree, you have to challenge them, take a
8 position tonight, write a comment to them.

2 9 Secondly, there's no analysis of the unique local
10 conditions along US 95. And I'm talking about what
11 professional transportation planners call steep upgrades and
12 downgrades, horizontal curves with a radius of less than 800
13 feet, critical side slopes and steep dropoffs.

14 Anybody who's driven that route knows there are
15 conditions A, that will increase the probability of accidents;
16 B, conditions that will challenge the NRC's standards for cans;
17 and C, if you have an accident, if there's a release of
18 radioactivity, it's going to be hard to get in there to clean
19 it up, but even if there's no release of radioactivity, it's
20 going to be an enormous job just to get in there and recover
21 the cans.

22 So that's why you try normally to keep spent
23 nuclear fuel shipments off of roads like that.

24 Indeed that's a problem with all the routes that
25 are identified for heavy-haul transportation. None of them are

1 good, but I could give you the long talk about Las Vegas.

3

2 The bottom line is NDOT has already said when
3 shipments start big time, they're not going to allow shipments
4 on I-15 between the Utah border and the west side of Las Vegas.
5 They just haven't had to take that decision yet.

6 Similarly all these routes are going to have
7 problems with the NRC. In my statement -- and I won't read
8 this -- the NRC has identified five criteria that they advise
9 their staff to avoid.

10 When people want to ship spent fuel, they got to
11 go to the NRC first and get a route approval for routes that
12 will make it difficult for terrorists and saboteurs to take
13 down a shipment. None of the routes in the EIS comply with
14 those criteria.

15 Specifically we need to say a few things about
16 the Caliente/Chalk Mountain route. Forgive me if I say Chalk
17 River because Chalk River's a famous nuclear facility in Canada
18 and those of us who work in that field, it's just hard
19 sometimes. I've made that mistake about three times in the
20 last week.

21 First of all, the most difficult part of this
22 route that we're talking about is between here and Rachel. You
23 go out here to mile post 93, drive through Oak Springs Summit
24 to mile post 77 and you'll see sixteen miles where a whole lot
25 of road improvement, probably double-laning, guard rails,

1 everything, the same thing at Hancock Summit for fifteen miles,
2 and there's another ten miles in there and some of it goes
3 through fragile environment like around Crystal Springs.

4 So A, it's going to be difficult and expensive to
5 upgrade; B, there will be environmental impacts.

4
6 Another problem -- and again, I put the details
7 in my statement -- is Air Force overflights. In 1986, one of
8 the things DOE did right is they said: My goodness, military
9 aircraft impact with a shipping cask could cause an
10 unacceptable release of radioactive materials, so good thing
11 transportation isn't a disqualifying factor or we couldn't have
12 Yucca Mountain.

13 We've been waiting for thirteen years for DOE to
14 do a correct analysis of the issue. Now there's an analysis
15 in the DEIS and it assures you that a military or commercial
16 aircraft collision with a fixed facility -- they don't talk
17 about the transportation here -- isn't going to cause any
18 problem.

19 Well, guess what? They looked at the body of the
20 aircraft, the fuel and the projectile that is generated when a
21 jet engine or an engine shaft falls down. That isn't the
22 problem, folks.

23 The problem is they train with real live military
24 ordinance designed to blow up trucks and fortified
25 installations, and secondly they use dummy bombs that are steel
1 covered concrete dummies that weigh up to a ton and even a
2 dummy bomb is going to have more destructive impact on a cask
3 than an engine projectile that's evaluated in the DEIS.

4 See, there's a big probable here. The DOE has
5 not addressed a promise thirteen years ago. We're still
6 waiting for it.

7 And finally, there is this problem of what
8 happens. There's a phrase in wrestling called sugar footing.
9 You throw a foot out and hope somebody will attack and then
10 hope you have a good counter for it.

5

11 The State's concern with this Chalk Mountain
12 heavy-haul route is it's the only one that looks at all
13 feasible on paper, except that the Secretary of the Air Force
14 has said they're not going to let it go through.

15 To continue to let it be an option in the report
16 encourages people to keep thinking about heavy-haul
17 transportation, and then in the end, they end up using Route 6
18 and 95 through downtown Tonopah, through Goldfield and through
19 most of Beatty. That's an unfair way to handle these.

20 If someone can prove that that route will be
21 approved by the Air Force, fine. We don't have a problem with
22 it being considered. The way it is now, it should be taken out
23 of the EIS.

24 I know I'm out of time. Two closing points:

25 First of all, it's important to look at heavy-

1 haul trucks generically and look at them in relation to
2 specific sites.

3 They are rolling x-ray machines that can't be
4 turned off. There's no other way to put it.

5 I've done some calculations that I'll be refining
6 for the Final.

6

7 At the best, I think use of that route through
8 Esmeralda and Nye County is going to cause a lot of people to
9 get an extra 10 to 50 millirem per year just from heavy-haul

10 trucks.

11 That's like two to five extra chest
12 x-rays a year, assuming you've got a properly calibrated
13 machine, and that's a low enough exposure that no one can
14 really see what the cancer impacts or the genetic impacts are,
15 but it is a measurable dose to the general population that is
16 like saying, "Let's increase your natural radiation from all
17 sources by ten percent or more," and that's something that the
18 DEIS has to look at using different tools and different
19 analytical techniques.

20 Use of a rad tran model is crude. It doesn't
21 give you the kind of analysis you need.

7 | 22 Finally, remember my comments about costs this
23 morning. What's really bogus about the treatment of heavy-haul
24 here is it's probably the case that heavy-haul is a lot more
25 expensive and has a lot more adverse impacts than a rail spur,

1 and if DOE had done their job here, I'd be here today having an
2 honest debate with them on the issue that's pressing Mike
3 Baughman, which of those rail spurs looks -- looks more valid,
4 which has lower risk, but in fact because the DEIS has thrown
5 out all this garbage to make heavy-haul trucks look feasible,
6 we need to work on that one first.

7 I'm saying it's not feasible. We need to get it
8 out of the way now so we can have an intelligent debate about
9 the other issues.

10 And I thank you very much for listening.