

**STATEMENT OF ROBERT J. HALSTEAD ON BEHALF OF
THE STATE OF NEVADA AGENCY FOR NUCLEAR PROJECTS
REGARDING U.S. DEPARTMENT OF ENERGY DRAFT ENVIRONMENTAL
IMPACT STATEMENT FOR A GEOLOGIC REPOSITORY FOR THE
DISPOSAL OF SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE
AT YUCCA MOUNTAIN, NEVADA**

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Exhibit 1-2

LINCOLN, NEBRASKA

JANUARY 24, 2000

Diane Burton

Transportation of spent nuclear fuel (SNF) and high-level radioactive waste (HLW) is inherently risky business. At previous hearings, our preliminary transportation comments have addressed specific deficiencies in DOE's Draft Environmental Impact Statement (DEIS) regarding the radiological hazards of the SNF and HLW that DOE proposes to ship to Yucca Mountain, the shipment modes and routes, the risks associated with legal weight truck (LWT) transport, the vulnerability of shipments to human initiated events including terrorism and sabotage, DOE's failure to identify a preferred rail access corridor to Yucca Mountain, and DOE's failure to demonstrate the feasibility of heavy haul truck (HHT) transportation from an intermodal transfer station to the proposed repository, impacts of rail construction and operation, impacts on Native American lands and cultural resources, and social and economic impacts of public perception of transportation risks. These statements are available on the web at www.state.nv.us/nucwaste. At upcoming hearings we will address radiological health effects of routine transportation and radiological consequences of severe accidents.

1 Today our comments focus on DOE's failure to identify the cross-country truck and rail routes evaluated in the DEIS. [The draft EIS fails to identify the specific transportation routes for spent fuel and HLW shipments from specific reactor and generator locations to Yucca Mountain despite the fact that these routes were identified as part of the analyses contained in the transportation appendix. DOE, in effect, has chosen to hide these routes and simply report the analyses in a generic fashion.]

2 The manner in which the comment period and public hearings were noticed by DOE was and is misleading and intended to suppress public participation and public comments. Notices make no reference to the specific transportation routes, the types and volumes of shipments along each route, and the impacts to specific communities along identified routes.

3... Under the DEIS mostly truck scenario, DOE's preferred Nevada route to Yucca Mountain is I-15, the Las Vegas Beltway (I-215), and US 95. Using the HIGHWAY model, DOE contractors generated national routes from the 77 shipping sites to connect with the Las Vegas Beltway. These national routes are not revealed in the DEIS, but they are disclosed

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The routes used for the mostly truck impact analysis in the DEIS correspond to actual cross-country routes to I-15 and the Las Vegas Beltway. These routes generally are I-80 for shipments from the Northeastern and North Central states, I-70 for shipments from Southeastern and Midwestern states, and I-10 and I-40 for shipments from South Central and Southwestern states. Shipments from the Pacific Northwest and Idaho use I-84 and I-15. Shipments from Arizona and California use I-5, I-10, and I-15. [See DEIS reference TRW 1999udata, Chapter 4, file bt_map.prn. The origin-destination distances generated in miles in this file correspond to the origin-destination distances given in kilometers in DEIS Table J-11] The DEIS compares the transportation impacts calculated for the preferred route with impacts for six potential alternative routes identified by the State of Nevada to minimize shipments through the Las Vegas Valley. [See Table J-48]

The routes used in the DEIS make Nebraska one of the most heavily affected corridor states for truck shipments to Yucca Mountain, but the DEIS makes no specific reference to transportation impacts in Nebraska. One of the major truck routes to Yucca Mountain enters Nebraska on I-680 from Iowa, reconnects with I-80 in Omaha, and follows I-80 across Nebraska and then through Wyoming and Utah. According to the HIGHWAY model outputs in the DEIS reference, trucks using this route travel 459 miles in Nebraska in about 7 hours. Truck shipments using this route are presented in Table 1. Under the mostly truck scenario, proposed action, more than 20,400 truck shipments of SNF and HLW (about 41% of the total) traverse Nebraska over 24 years. Under the mostly truck scenario, modules 1 & 2, about 33,700 truckloads of SNF and HLW (about 35% of the total) traverse Nebraska over 39 years. Under either scenario, an average of two trucks per day would travel through Nebraska every day for decades. Additionally, Nebraska would be traversed by about 1,000 truck shipments of greater-than-Class-C low-level radioactive wastes to Yucca Mountain during the same time period.

4

Rail shipments to Yucca Mountain would have an even heavier impact on Nebraska. The DEIS evaluated four rail routing scenarios generated using the INTERLINE model. Under the DEIS routing scenarios, two major streams of rail shipments to Yucca Mountain converge in Gibbon, Nebraska, at the junction of the Union Pacific mainlines from Chicago and Kansas City. A smaller number of shipments travel the UP from Nebraska City through Omaha to Fremont, and the BNSF from Pacific Junction, Iowa through Lincoln to Denver. Rail shipments along these routes, which total more than 900 route miles in Nebraska, are presented in Tables 2 and 3. Under the mostly rail scenario, proposed action, more than 8,900 rail shipments (about 82% of the total) traverse Nebraska over 24 years. Under the mostly rail scenario, modules 1 & 2, more than 13,900 rail shipments (about 70% of the total) traverse Nebraska over 39 years. Under either scenario, an average of 1 rail cask-shipment per day would travel through Nebraska every day for decades. Additionally, I-680 and I-80 through Nebraska would be traversed by about 1,900 to 2,600 truck shipments of SNF from reactors in New England, New York, and Minnesota, an average of about one truck shipment per week, during the same time period.

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TABLE 1							
YMDEIS TRANSPORTATION IMPACTS							
SHIPMENTS THROUGH NEBRASKA ON I-80							
DOE MOSTLY TRUCK SCENARIO							
DOE BASE CASE ROUTING							
				Proposed Action	Modules 1&2		
Truck Shipments of Commercial SNF							
Haddam Neck(CT)				255	255		
Millstone(CT)				1066	1669		
Arnold(IA)				279	420		
Braidwood(IL)				615	1494		
Byron(IL)				617	1444		
Clinton(IL)				296	690		
Dresder/Morris(IL)				1386	1569		
La Salle(IL)				596	1261		
Quad Cities(IL)				798	1123		
Zion(IL)				771	1028		
Pilgrim(MA)				316	476		
Yankee-Rowe(MA)				134	134		
Calvert Cliffs(MD)				757	1140		
Maine Yankee(ME)				356	356		
Big Rock Point(MI)				131	131		
Cook(MI)				824	1235		
Fermi(MI)				312	764		
Palisades(MI)				367	454		
Monticello(MN)				267	342		
Prairie Island(MN)				572	805		
Cooper(NE)				274	454		
Fort Calhoun(NE)				258	362		
Seabrook(NH)				235	630		
Oyster Creek(NJ)				424	519		
Salem/Hope Creek(NJ)				1027	1992		
Fitzpatrick/Nine Mile(NY)				1094	1971		
Ginna(NY)				309	379		
Indian Point(NY)				701	1155		
Davis-Besse(OH)				286	535		
Perry(OH)				288	631		
Beaver Valley(PA)				551	1156		
Limerick(PA)				693	1722		
Peach Bottom(PA)				924	1408		
Susquehanna(PA)				808	1582		
Three Mile Island(PA)				287	435		
Vt Yankee(VT)				369	484		
Kewaunee(WI)				288	401		
LaCrosse(WI)				37	37		
Point Beach(WI)				575	742		
Corridor Subtotal				20143	33385		
Truck Shipments of DOE SNF & HLW							
DOE West Valley(NY)				300	300		
HLW							

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TABLE 2						
YMDAIS TRANSPORTATION IMPACTS						
RAIL SHIPMENTS THROUGH NEBRASKA FROM IOWA AND NEBRASKA						
DOE MOSTLY RAIL SCENARIO						
DOE BASE CASE ROUTING						
					Proposed Action	Modules 1&2
Rail Shipments from Nebraska Reactors						
UP from Nebraska City to Omaha to Fremont to Cheyenne, WY, 521.9 miles in NE)						
Cooper(NE)					103	166
UP from Blair to Fremont to Cheyenne, WY, 449.5 miles in NE)						
Ft Calhoun(NE)					87	121
Total from Nebraska					190	287
Rail Shipments through Nebraska from Iowa						
UP from California Jct., IA, to Fremont to Cheyenne, WY, 451.5 miles in NE						
Millstone(CT)					367	524
Arnold(IA)					105	158
Braidwood(IL)					95	215
Byron(IL)					138	244
Clinton(IL)					103	200
Dresden/Morris					429	491
Zion(IL)					147	250
Yankee Rowe(MA)					15	15
Calvert Cliffs(MD)					198	303
Maine Yankee(ME)					60	60
Big Rock Pt(MI)					8	8
Cook(MI)					214	346
Fermi(MI)					100	199
Palisades(MI)					78	117
Prairie Island(MN)					151	221
Grand Gulf(MS)					76	143
Seabrook(NH)					37	83
Oyster Creek(NJ)					108	151
Salem/Hope Creek(NJ)					239	421
Fitzpatrick(NY)					54	79
Nine Mile Pt(NY)					236	373
DOE-West Valley			HLW		60	60
DOE-West Valley			SPAR		56	56
Davis-Besse(OH)					44	71
Perry(OH)					42	82
Beaver Valley(PA)					86	160
Umerick(PA)					262	497
Peach Bottom(PA)					265	403
Susquehanna(PA)					119	219
Three Mile Island(PA)					71	113
North Anna(VA)					101	167
Vermont Yankee(VT)					139	182
Kewaunee(WI)					73	106
Pt Beach(WI)					93	118
Corridor Subtotal					4367	6835

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EIS001046

BNSF from Pacific Jct, IA, to Oreapolis to Lincoln to Bush, Colorado, 387.0 miles in NE							
					89	172	
LaSalle(IL)					299	419	
Quad Cities(IL)					388	591	
Corridor Subtotal							
					4758	7426	
Total from Iowa							

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TABLE 3							
YMDEIS TRANSPORTATION IMPACTS							
RAIL SHIPMENTS THROUGH NEBRASKA FROM MISSOURI							
DOE MOSTLY RAIL SCENARIO							
DOE BASE CASE ROUTING							
						Proposed Action	Modules 1&2
UP from Kansas City, KS to Gibbon, NE to Cheyenne, WY, 403.5 miles in NE							
Browns Ferry(AL)(SNF)						327	590
Farley(AL)(SNF)						103	157
Arkansas(AR)(SNF)						170	252
St Lucie 2(FL)(SNF)						88	140
Turkey Point(FL)(SNF)						145	228
Hatch(GA)(SNF)						128	197
Vogtle(GA)(SNF)						195	431
Wolf Creek(KS)(SNF)						52	106
Callaway(MO)(SNF)						62	114
Brunswick(NC)(SNF)						201	321
Harris(NC)(SNF)						150	258
McGuire(NC)(SNF)						253	427
Catawba(SC)(SNF)						148	253
Oconee(SC)(SNF)						254	373
Robinson(SC)(SNF)						75	97
Summer(SC)(SNF)						46	82
DOE-Savannah River(SC)(SNF)						149	159
DOE-Savannah River(SC)(HLW)						1200	1240
DOE-Savannah River(SC)(GTCC)						0	75
DOE-Savannah River(SC)(SPAR)						0	290
Sequoyah(TN)(SNF)						90	161
Watts Bar(TN)(SNF)						21	121
Surry(VA)(SNF)						105	144
Corridor Subtotal						3962	6216