webserver@yucca-web2.ymp.gov on 02/10/2000 01:31:29 AM

To: EISR/YM/RWDOE
cc:

Subject: EIS Comment

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IP address: 206.158.250.148

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1 these routes will obviously be the actual routes used if a mostly rail scenario is utilized.

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The Nebraska routes identified in the DEIS are all Centralized Traffic Control, and Automatic Block System routes, systems that run trains in a fashion similar to the stop light system we are all familiar with on todays roads, red to stop, green to go, and yellow for caution. When a rail breaks in these types of systems, a circuit is broken and usually a train approaching that section of track will then get a red track light, meaning stop. The train dispatcher then comes on the radio and talks the train by the stop signal at a restricted speed, knowing that there may be a broken rail ahead of the train. If the train encounters a broken rail and cannot stop in time, the individual engines and cars my simply bounce over the break or they may actually derail, albeit at a slower speed. A low speed derailment shouldn't cause a problem, considering the proposed design of the shipping casks for high-level waste. If the low speed derailment happens in a multiple main track section, then there could be problems as t

Often a rail breaks underneath a train, usually toward the front of a 100 to 150-car train. When this happens, obviously the train crew isn't aware and the train continues on at full speed over the break. Other times a rail breaks in a certain section of track, a turnout or switch for instance, where the signal system is not designed to indicate the break and again you have trains running at 50 mph over a broken rail. When a rail breaks in cold weather the rail "pulls apart" or contracts leaving the two broken ends anywhere from one to six inches apart. A rail may break in two places simultaneously and a three to four foot chunk of rail will fall out and be pulverized by the wheels of the train pounding over it at 50 mph. I want the DOE to understand that these types of incidents happen on a daily basis on the 50 mile section of track that I inspect even though the BNSF runs electronic rail flaw detection cars over the track every 20 to 30 days. Overnight, February 6, 2000 three rails broke under trains in

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The DEIS states that the cask design has been tested through simulation to withstand worse case scenario disasters, which includes withstanding a 30-minute all-engulfing fire at 800 degrees Celsius and a 40 inch fall onto a 6-inch diameter steel rod. It is not hard for me to imagine a derailment on a section of multiple main track involving a coal train and a freight train moving in opposite directions at 50 mph less than 15 feet apart. The cask car containing the nuclear waste slams into the coal cars and is buried under 700 tons (10 cars) of coal, from 20 cars back the force of an additional 100 cars hurls two cars of propane, carrying 150,000 pounds of fuel each, into the pile of twisted metal and they ignite. Now you have an all-engulfing fire that wont burn for 30 minutes, but for 8 hours. The men and women and the two fire trucks of the Gibbon, NE. Volunteer Rural Fire

Department stand back and watch it burn, wondering how they will extinguish the pile of coal after the two tank cars burn themselves out. Hazardous material regulations should separate highly flammable cars from the cars containing nuclear waste lessening the potential for this type of incident but on February 8, 2000, a 120-car freight left Lincoln, NE. and was 25 miles down the line when a failed equipment detector/car counter at Firth, NE. indicated two extra, unknown cars on the train. After all the paperwork was checked it was discovered that the unknown cars contained hazardous, flammable material.

I would like to emphasize that I am not being an alarmist, with the exception of the flaming tank cars in the derailment, these are all situations that I see on a daily basis. I'm sure if you wanted to check with the Federal Railroad Administration you could find more than one example of burning cars of hazardous material. Because of the potential of the unthinkable happening I would suggest that the DEIS failed to considered the following:

Intro to #4, 5, 6, 7 and 8

4 1. Notification

Because railroad maintenance personnel will be the first responders we should be notified of trains handling high-level nuclear waste, and should be included in training programs.

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5 2. Car placement

Because so many rail break under trains, the cask car should be head end only so it will have a better chance to cross a rail before breaking or at least the broken rail won't have deteriorated as badly when the car crosses it. Also the train crew can better observe the cask car.

6 3. Operating rules

Review existing operating rules and practices of the railroads transporting high-level nuclear waste. Trains containing high-level nuclear waste should not be talked by restrictive signals that could indicate a broken rail until the track section ahead has been inspected by a qualified inspector.

7 4. Exposure limits

The exposure limits in Section 6 of the DEIS were figured using an average of radioactivity for spent nuclear fuel that had cooled for periods of 10 years, and cooled for periods of 24 years. In actuality many shipments will contain only spent nuclear fuel that has cooled for 10 years, making the exposure potential in a disaster much higher than the figures shown in the DEIS.

8 5. Liability

Because of the long time frame between exposure and potential injury, discovery dates should be greatly extended for recovery and liability clearly assigned to those producing and transporting high-level waste.

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The DOE states that more than 2,500 shipments of spent nuclear fuel have been safely carried out in the United States in the past 35 years and that is wonderful but we will now equal and exceed that amount of waste shipped, just through Nebraska, in the first six to seven years of the projected life of the campaign. Under the mostly rail scenario, modules 1 & 2, more than 13,900 rail shipments will cross Nebraska over 39 years. When this campaign of transporting high-level nuclear waste begins, it won't be a special event that takes place every now and then. When this campaign begins there will be more than one shipment per day moving along Nebraska's highways and rail system, a rail system that is already highly stressed with a maintenance program that is a work in progress, trying to keep pace.

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