

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

**PRESENTED AT THE PUBLIC HEARING IN
SALT LAKE CITY, UTAH
JANUARY 13, 2000**

While the U.S. Department of Energy (DOE) is conducting public hearings on its draft Environmental Impact Statement (EIS) for a High-Level Radioactive Waste Repository at Yucca Mountain, Nevada in various cities around the country, DOE has gone to considerable lengths to conceal information about nuclear waste transportation routes, shipment numbers, and risks to specific states and communities located on or near transportation corridors to a Nevada repository.

The notices for this public hearing, for example, refer only to a draft EIS for a radioactive waste repository in Nevada. They do NOT indicate that people in the Salt Lake City metropolitan area, other parts of Utah, Arizona, and other western states stand to be impacted in a major way by thousands of radioactive materials shipments as a direct result of the Yucca Mountain program.

The irony of the situation is that DOE has, in fact, done the analyses needed to reveal specific highway and rail routes that would be used for waste shipments. However, that information is buried in data used to run computer models and is never made explicit in the draft EIS. The draft contains no maps or other information showing which cities and communities along transportation corridors will be affected by this massive and unprecedented high-level radioactive waste shipping campaign.

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

Nevada believes that DOE has violated the National Environmental Policy Act by concealing crucial information used in the draft EIS. Absent this information, persons affected by the transportation impacts of the proposed action have no way of determining the substantive and legal sufficiency of DOE's analysis. Such concealment of information can only diminish public confidence in DOE's ability to safely transport these highly radioactive materials.

After considerable effort and a frustrating exercise involving trial and error (one Nevada transportation consultant employed to assist with the review of the draft EIS likened it to breaking the Japanese military codes during World War II), the State of Nevada was able to extract DOE's shipment routes, modes, and shipment numbers from the raw data contained in draft EIS reference materials.

Under DOE's shipping scenario, Utah would be the most heavily affected corridor state for truck shipments to Yucca Mountain. Yet the DEIS make no particular reference to transportation impacts in Utah. Three major truck routes to Yucca Mountain traverse Utah:

- I-15 from Idaho to Arizona (405 miles in Utah);
- I-80, I-215, and I-15 from Wyoming to Arizona (381 miles in Utah); and
- I-70 and I-15 from Colorado to Arizona (364 miles in Utah).

Depending upon the scenarios evaluated in the draft EIS, between 43,000 and 80,000 truck shipments traverse Utah over 24 years. Under either scenario, an average of 5 to 6 trucks per day would travel through Utah every day for decades. Additionally, Utah would be impacted by about 300 rail cask-shipments of naval reactor spent fuel and about 2,500 truckloads of miscellaneous radioactive wastes during the same time period. (See Table 1 for additional detail on the truck shipments scenario.)

Rail shipments to Yucca Mountain would also heavily impact Utah. Under the routing scenarios DOE used in the draft EIS, rail shipments of highly radioactive materials will traverse Utah on four rail lines:

- The Union Pacific from Grand Junction, Colorado, to Southern Nevada (461 miles in Utah);
- The Union Pacific from Granger, Wyoming to Southern Nevada (390 miles in Utah);
- The Union Pacific from Pocatello, Idaho to Southern Nevada (381 miles); and
- From Colorado, Idaho, or Wyoming to Wells, Nevada, via Ogden.

Under the mostly rail scenarios, between 10,600 and 18,400 rail shipments traverse Utah over 24 years, an average of 8 to 9 rail casks per week, every week for decades. Additionally, even with most shipments coming by rail, Utah would also be impacted by an average of two truck shipments per week during the same time period. (See Table 2 for additional information on rail shipments.)

The information presented above is not found anywhere in the draft EIS. Failure to disclose shipment routes, modes, and volumes in a manner that permits affected communities to participate effectively in the reviewing the draft EIS, as required by the National Environmental Policy Act, should be grounds for declaring the Yucca Mountain EIS legally deficient and requiring DOE to revise and re-issue the draft document for a new round of public review and comment.

Table 1

YMDEIS TRANSPORTATION IMPACTS
 SHIPMENTS THROUGH UTAH
 DOE MOSTLY TRUCK SCENARIO
 DOE BASE CASE ROUTING (TRW1999udata, Ch. 4, file bt_map.prn)

	Proposed Modules 1&2 Action	
Truck Shipments of Commercial SNF		
Shipments from Wyoming on I-80	20143	33385
Shipments from Colorado on I-70	10898	19667
Shipments from Idaho on I-15	548	931
Subtotal	31589	53983
Truck Shipments of DOE SNF & HLW		
Shipments from Wyoming on I-80	300	300
Shipments from Colorado on I-70	7683	7945
Shipments from Idaho on I-15	3802	17776
Subtotal	11785	26021
Total Truck Shipments	43374	80,004
Rail Shipments of Naval Reactor SNF		
Shipments from INEEL on Union Pacific	300	300

Table 2

YMDEIS TRANSPORTATION IMPACTS

SHIPMENTS THROUGH UTAH

DOE MOSTLY RAIL SCENARIO

DOE BASE CASE ROUTING (TRW1999udata, Ch. 4, files ca_rail.prn, bt_map.prn)

	Proposed Action Modules 1&2	
Rail Shipments of Commercial SNF		
Union Pacific from Granger, WY	7054	11458
Union Pacific from Pocatello, ID	86	140
Union Pacific from Grand Junction, CO	575	1029
Rail Shipments of DOE SNF & HLW		
Union Pacific from Granger, WY	1830	1918
Union Pacific from Pocatello, ID	1040	3819
Union Pacific from Grand Junction, CO	36	38
Rail Total	10621	18402
Truck Shipments of Commercial SNF		
I-80 from Wyoming	1885	2644
I-70 from Colorado	672	1013
Truck Total	2557	3657