

**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**

**PRESENTED AT THE PUBLIC HEARING IN  
CLEVELAND, OHIO  
JANUARY 28, 2000**

**The manner in which the comment period and public hearings for the draft Environmental Impact Statement (DEIS) for the proposed Yucca Mountain High-Level Radioactive Waste Repository have been noticed by DOE 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; nor is such information to be found in the draft EIS document.**

**The State of Nevada has attempted to address these issues in comments delivered at various public hearings around the country. The State's preliminary transportation comments have addressed specific deficiencies in DOE's 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](http://www.state.nv.us/nucwaste).**

**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 and references. DOE, in effect, has chosen to hide these routes and simply report the analyses in a generic fashion. The State of Nevada has been able, after considerable effort, to 'back out' those specific routes from modeling data contained in DEIS references. Those routes make Ohio the gateway to Yucca Mountain for all of the commercial nuclear power reactors in the Northeastern and Middle Atlantic states, but the DEIS makes no specific reference to transportation impacts in Ohio.**

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 in the DEIS references, which can be accessed on the worldwide web at [www.ymp.gov/timeline/eis/trw1999udata](http://www.ymp.gov/timeline/eis/trw1999udata).

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 highway routes used in the DEIS make Ohio a major corridor state for truck shipments to Yucca Mountain. Three of the principal truck routes from Eastern reactors enter Ohio from Pennsylvania on I-90, I-80, and I-76; converge on the Ohio Turnpike (I-80/I-90) at Elyria; and then continue west through Indiana, Illinois, and Iowa on I-80. These routes traverse the Cleveland and Toledo metropolitan areas, and more than 300 miles on rural Ohio interstate highways. Truck shipments through Ohio are presented in Table 1. Under the mostly truck scenario, proposed action, about 11,200 truck shipments of SNF and HLW (about 22% of the total) traverse Ohio over 24 years. Under the mostly truck scenario, modules 1 & 2, about 18,900 truckloads of SNF and HLW (about 20% of the total) traverse Ohio over 39 years. Under either scenario, an average of 1.3 trucks per day would travel through Ohio every day for decades. Additionally, Ohio would be traversed by 100 to 200 truckloads of greater-than-Class-C low level radioactive wastes from commercial reactors to Yucca Mountain during the same time period.

Rail shipments to Yucca Mountain would also heavily impact Ohio. The DEIS evaluated four rail routing scenarios using the INTERLINE model. Under the DEIS routing scenarios, two major streams of rail shipments to Yucca Mountain converge in Cleveland, at the interchange of Conrail mainlines from Buffalo and Harrisburg. A smaller number of shipments travel the Norfolk Southern from Cleveland to Chicago, the Norfolk Southern from West Virginia to Kansas City via Portsmouth, and the CSXT from Pennsylvania to Chicago via Youngstown and Akron. Rail shipments along these routes, which total almost 1,000 route miles in Ohio, are presented in Table 2. Under the mostly rail scenario, proposed action, about 2,700 rail shipments (about 25% of the total) traverse Ohio over 24 years. Under the mostly rail scenario, modules 1 & 2, about 4,200 rail shipments (about 21% of the total) traverse Ohio over 39 years. Additionally, I-76, I-80, and I-90 through Ohio would be traversed by between 1,600 to 2,300 truck shipments of SNF from reactors in New England and New York which cannot economically ship by rail. Under either scenario, an average of 1 shipment every two days would travel through Ohio for three or four decades.

**TABLE 1**  
**YMDEIS TRANSPORTATION IMPACTS**  
**TRUCK SHIPMENTS THROUGH OHIO**  
**DOE MOSTLY TRUCK SCENARIO**  
**DOE BASE CASE ROUTING (TRW1999udata, Ch. 4, file bt\_map.prn)**

	<b>Proposed Action</b>	<b>Modules 1&amp;2</b>
<b>Shipments from Ohio Reactors Using I-90, I-271, I-480, and I-80/90</b>		
Perry(OH)	288	631
<b>Shipments from Ohio Reactors Using I-80/90</b>		
Davis-Besse(OH)	286	535
<b>Shipments from Pennsylvania Using I-90, I-271, I-480, and I-80/90</b>		
Pilgrim(MA)	316	476
Yankee-Rowe(MA)	134	134
Maine Yankee(ME)	356	356
Seabrook(NH)	235	630
Fitzpatrick/Nine Mile(NY)	1094	1971
Ginna(NY)	309	379
Indian Point(NY)	701	1155
DOE West Valley(NY)(HLW)	300	300
Vt Yankee(VT)	369	484
<b>Corridor Subtotal</b>	<b>3814</b>	<b>5885</b>
<b>Shipments from Pennsylvania Using I-80 and I-80/90</b>		
Haddam Neck(CT)	255	255
Millstone(CT)	1066	1669
Susquehanna(PA)	808	1582
<b>Corridor Subtotal</b>	<b>2129</b>	<b>3506</b>
<b>Shipments from Pennsylvania Using I-76, I-80 and I-80/90</b>		
Calvert Cliffs(MD)	757	1140
Oyster Creek(NJ)	424	519
Salem/Hope Creek(NJ)	1027	1992
Beaver Valley(PA)	551	1156
Limerick(PA)	693	1722
Peach Bottom(PA)	924	1408
Three Mile Island(PA)	287	435
<b>Corridor Subtotal</b>	<b>4663</b>	<b>8372</b>
<b>Ohio Total</b>	<b>11180</b>	<b>18929</b>

**TABLE 2  
YMDEIS TRANSPORTATION IMPACTS  
RAIL AND TRUCK SHIPMENTS THROUGH OHIO  
DOE MOSTLY RAIL SCENARIO, DOE BASE CASE ROUTING**

	<b>Proposed Action</b>	<b>Modules 1&amp;2</b>
<b>Rail Shipments from Ohio Reactors Using NS to Cleveland to Chicago (208.4 miles in OH)</b>		
Davis-Besse(OH)	44	71
Perry(OH)	42	82
<b>Rail Shipments Using CR from Erie, PA, to Cleveland to Toledo to Chicago (246.9 miles in OH)</b>		
Millstone(CT)	367	524
Yankee Rowe(MA)	15	15
Maine Yankee(ME)	60	60
Seabrook(NH)	37	83
Fitzpatrick(NY)	54	79
Nine Mile Pt(NY)	236	373
DOE-West Valley(NY)(HLW & SPAR)	116	116
Vermont Yankee(VT)	139	182
Corridor Subtotal	1024	1432
<b>Rail Shipments Using CR from Beaver Falls, PA, to Cleveland to Chicago (267.5 miles in OH)</b>		
Calvert Cliffs(MD)	198	303
Oyster Creek(NJ)	108	151
Salem/Hope Creek(NJ)	239	421
Limerick(PA)	262	497
Peach Bottom(PA)	265	403
Susquehanna(PA)	119	219
Three Mile Island(PA)	71	113
Corridor Subtotal	1262	2107
<b>Rail Shipments Using CSXT from New Castle, PA, to Younstown to Chicago (259.6 miles in OH)</b>		
Beaver Valley(PA)	86	160
North Anna(VA)	101	167
<b>Rail Shipments Using NS from Kenova, WVA to Portsmouth to Kansas City (184.6 miles in OH)</b>		
Surry(VA)	105	144
<b>Total Rail Shipments Through Ohio</b>	<b>2664</b>	<b>4163</b>
<b>Truck Shipments from Pennsylvania on I-90,I-271,I-480,I-80/90 (255.0 miles in OH)</b>		
Pilgrim(MA)	316	476
Ginna(NY)	309	379

Corridor Subtotal	625	855
<b>Truck Shipments from Pennsylvania on I-80,I-80/90 (239.0 miles in OH)</b>		
Haddam Neck(CT)	255	255
Indian Point(NY)	701	1155
Corridor Subtotal	956	1410
<b>Total Truck Shipments Through Ohio</b>	<b>1581</b>	<b>2265</b>