STATEMENT OF JIM HALL,
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ON BEHALF OF THE
STATE OF NEVADA
AGENCY FOR NUCLEAR PROJECTS
ON THE U.S. DEPARTMENT OF ENERGY
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR THE DISPOSAL OF SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE AT YUCCA MOUNTAIN, NYE COUNTY, NEVADA

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My name is Jim Hall and for almost seven years, I served as Chairman of the National Transportation Safety Board (NTSB). The NTSB is the federal agency that is charged with the investigation of major transportation accidents, or as I liked to say, is the “eyes and ears” of the American people at transportation accidents across the country and around the world. In that role, I became all too familiar with the human and economic toll caused by these accidents. As a result, the Board and I did everything possible to find ways to prevent such tragedies from recurring.

Prior to heading the NTSB, I served for six years as the Director of the State of Tennessee’s State Planning Office, which was charged with overseeing the Department of Energy’s clean-up of the Oak Ridge nuclear weapons complex.

Today I am speaking on behalf of the State of Nevada, Agency for Nuclear Projects. My comments address the transportation aspects of the Draft Supplemental Environmental Impact Statement (DSEIS). I want to begin by pointing out that the Department of Energy (DOE) still does not have a comprehensive plan for the safe transportation of spent nuclear fuel and high-level nuclear waste to the proposed repository at Yucca Mountain.

I came to this issue in May 2002. This was after the DOE issued its Final Environmental Impact Statement (FEIS) and I was asked to give my opinion on this and related matters before the United States Senate. In my testimony I noted an important fact: even though DOE was moving ahead with the Yucca Mountain site selection process, they had yet to put in place a transportation plan. In fact, I was surprised to learn that then-Secretary Abraham, in testimony before Congress said, “The DOE is just beginning to formulate its preliminary thoughts about a transportation plan.” When I heard this statement, I was shocked. How and why would they decide on a repository if they did not yet know if
they could safely transport this highly radioactive waste to the site? For me, it was a clear case of putting the cart before the horse.

Fast forward five years to March 2007. I was listening to the current DOE waste program Director, Ward Sproat, giving a presentation to a mostly pro-Yucca Mountain audience here in Washington. Director Sproat said right out that Nevada was correct to criticize DOE for not having a transportation plan, and he pledged to fix that. Sure enough, in July 2007 DOE issued a draft National Transportation Plan for public review, and it even had Sproat’s name on the title page. But there was immediate controversy over a table in the Plan that said construction of the Nevada railroad project could cost up to $3.2 billion. Before we could submit our comments, DOE announced that the Plan had been withdrawn until further notice.

So now, almost 70 months after DOE selected Yucca Mountain, there is still no national transportation plan, but there are two new Draft EISs, the documents we are here to comment upon today. The DSEIS is a large document, over a thousand pages, and at first reading it appears to say a lot about transportation. But when you analyze it, you find a remarkable absence of meaningful details. This certainly is not a transportation plan. But it does raise a lot of unanswered questions.

The DSEIS tells us that DOE is prepared to ship all the projected spent nuclear fuel from US Nuclear power plants to Yucca Mountain, if Congress amends the law. That would require 5,000 truck shipments, and 24,000 rail casks in 7-8 thousand trains, over 50 years, or 2 trucks and 3 trains every week. Considering the average shipment distance would be about 2,000 miles, and an average shipment time of 2-5 days, it quickly becomes apparent that every day for 50 years there would be a one or more DOE shipments to Yucca Mountain on the roads and rails somewhere in our great land.

The DSEIS tells us that DOE wants to ship most of the spent nuclear fuel by rail in so-called TAD (transport, aging, and disposal) canisters. But the TAD canister system doesn’t exist yet, its under development, and we already know that it will not be compatible with most of the current dry storage systems, we know that one-third of the reactor sites cannot use TADs without intermodal shipments by barges or monster heavy haul trucks, we don’t know how many if any utilities would use the TADs if they were available, and the DSEIS has no contingency plan for how the repository system would function if the TAD idea doesn’t work out.

The DSEIS tells us that DOE does not intend to ship the oldest or older fuel first, which the National Academy of Sciences recommended as a way of reducing risk and demonstrating DOE’s ability to remove spent fuel from shutdown reactor sites. Instead, DOE has designed the TADs to accommodate high-burnup fuel that has only been cooled 5-10 years, inviting the utilities to ship the hottest fuel first, exactly the opposite of a transportation risk reduction strategy.

The DSEIS tells us that DOE has not selected the routes that will be used for shipments to Yucca Mountain, that DOE has only studied “representative routes,” despite all the
maps and tables that purport to show exactly how many shipments would travel through each state. Confusing? Based on 20 years of routing studies by DOE, Nevada, and others, we know that whatever final routes are selected, the shipments to Yucca Mountain will traverse 40-45 states, 600-700 counties, and 40-50 American Indian Nations. Once those shipments get to Nevada, there is no confusion about impacts on Las Vegas – at least 8% of the rail shipments, and perhaps 40% or even 80%, would use the Union Pacific mainline to Caliente through downtown Las Vegas, traveling within one-half mile of the world famous Las Vegas Strip. DOE’s preferred highway route would steer all of the truck shipments through the northern and western Las Vegas suburbs on the I-215 beltway. Is it any wonder that 75% of Nevadans oppose Yucca Mountain?

DOE now says that they will use dedicated trains for rail shipments, after 30 years of saying it was perfectly acceptable to put spent fuel casks in general freight trains with other hazardous materials. And DOE acknowledges that shipping casks are vulnerable to terrorist attacks. And DOE acknowledges that cleaning up after a very severe accident or incident that releases radioactive material could cost up to $10 billion. We appreciate the opportunity to make these comments, and will be providing written comments on the Yucca Mountain SEIS. And we’re still looking forward to reviewing the DOE National Transportation Plan.