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9           NOV 16 1999       MS. SCHWARTZ:  If Holmes promises not to  
10 start clocking off my time, I would like to say how  
11 great it is to be back in the State of Colorado.  I  
12 spent six years here working for Governor Romer and the  
13 Western Governors' Association.

14                        It's a delight to be back to see friendly  
15 and familiar faces.  Thank you all for coming out.

16                        My name is Ginger Schwartz.  I represent  
17 the Office of the Governor, Nevada Agency for Nuclear  
18 Projects.  I'm here this afternoon on behalf of Robert  
19 Lucks, the executive director of that agency.

20                        In order for people to participate in the  
21 National Environmental Policy Act (NEPA) process, they  
22 must first be afforded the opportunity to know that a  
23 major federal action has the potential to impact them  
24 and their communities.  While the U.S. Department of  
25 Energy is conducting public hearings in various

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1 communities in Nevada and around the country, DOE has  
2 made no effort to inform citizens and public officials  
3 of the relevance of the draft Environmental Impact  
4 Statement to them and their states and communities.

1 5 [The notices of this public hearing, for  
6 example, refer only to a draft EIS for a radioactive  
7 waste repository at Yucca Mountain, Nevada. They do not  
8 indicate that people in the Denver metropolitan area,  
9 other parts of Colorado, Wyoming, and other western  
10 states stand to be significantly impacted by thousands  
11 of radioactive materials shipments as a direct result  
12 of the Yucca Mountain program.

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

2 17 [Nevada believes that DOE has violated NEPA  
18 by concealing crucial information used in the draft  
19 EIS. Absent this information, persons affected by the  
20 transportation impacts of the proposed action have no  
21 way of determining the substantive and legal  
22 sufficiency of DOE's analysis. Such concealment of  
23 crucial information can only diminish public confidence  
24 in DOE's ability to safely transport these highly  
25 radioactive materials.]

3 1 [DOE contractors who prepared the draft EIS  
2 actually selected specific routes for analysis using  
3 the HIGHWAY and INTERLINE models. A draft EIS  
4 reference even describes the procedures followed;  
5 however, DOE decided not to reveal the actual highway  
6 and rail routes used in the draft document, and the TRW  
7 reference does not provide a written summary or maps of  
8 the information provided to DOE on computer files.

9 The State of Nevada has sponsored a number  
10 of routing studies over the past decade using the same  
11 computer models as DOE's consultants. A 1994 study  
12 prepared by the University of Nevada, Las Vegas  
13 Transportation Research Center, indicates that if  
14 Nevada does not designate preferred alternative routes  
15 and DOE shipping contractors follow the quickest routes  
16 consistent with federal regulations, the primary  
17 east-west highway corridors would be I-80 from Ohio to  
18 Utah, I-70 from Pennsylvania to Utah, and I-15 from  
19 Utah to Nevada.

20 Using the shipment numbers in the draft  
21 EIS and highway routing studies prepared by the UNLV  
22 Transportation Research Center, the State of Nevada has  
23 developed a preliminary estimate of potential  
24 legal-weight truck shipments through Colorado and  
25 Wyoming to Nevada. Table I shows potential truck

3 cont'd. 1 shipments of SNF and HLW through Colorado and Denver on  
2 I-70.

3 Under the mostly truck scenario, there  
4 would be about 35,350 shipments through Denver over 39  
5 years. Put another way, there would be an average of  
6 2.5 truck shipments per day on I-70 through Denver  
7 every day, seven days a week, for as many as 39 years.

8 Table II shows potential truck shipments  
9 of SNF and HLW through Wyoming on I-80. Under the  
10 mostly truck scenario, there would be about 27,600  
11 shipments through Wyoming over 39 years. That would  
12 mean an average of almost two truck shipments per day  
13 through Wyoming on I-80 every day, seven days a week,  
14 for 39 years.]

4 15 [The draft EIS fails to evaluate the most  
16 likely, and potentially heaviest impact, modal mix,  
17 which is rail/truck/barge scenario for civilian SNF  
18 shipments. The draft EIS mostly rail scenario  
19 significantly misrepresents the extent to which  
20 legal-weight truck shipments to the repository can be  
21 reduced by unrealistically assuming major investment at  
22 reactor sites and unprecedented and likely infeasible  
23 use of heavy haul truck and barge transport.

24 Nevada believes that the final EIS must  
25 evaluate a transportation scenario based on the current

4 cont'd.

1 transportation capabilities of reactor and storage  
2 sites.

3 Planning Information Corporation of Denver  
4 developed a current capabilities transportation  
5 scenario for the State of Nevada in September, 1996.  
6 Under the PIC current capabilities scenario, 32 reactor  
7 and storage sites in 19 states ship civilian spent  
8 nuclear fuel to the repository by legal-weight truck.  
9 These 32 sites account for about 35 percent of the  
10 total civilian SNF inventory shipped to the repository.

11 Using the shipment numbers in the draft  
12 EIS and the PIC mode and route assumptions, the State  
13 of Nevada has developed a preliminary estimate of  
14 shipments under the current capabilities scenario.  
15 Table III indicates there would be almost 9,100 rail  
16 shipments through Colorado and Wyoming over 39 years,  
17 an average of about 4.5 cask shipments per week, every  
18 week, for 39 years.

19 Almost all of the rail shipments would  
20 follow the Union Pacific mainline from Gibbon,  
21 Nebraska, to Salt Lake City through northeastern  
22 Colorado and southern Wyoming. Shipments from at least  
23 one reactor in Illinois would use the former Southern  
24 Pacific route through Grand Junction.

25 There would also be a considerable number

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4 cont'd. 1 of legal weight truck shipments through Colorado and  
2 Wyoming under the current capabilities scenario. Table  
3 IV shows there would be about 12,660 shipments through  
4 Colorado on I-70, an average of 6.2 shipments per week,  
5 every week, for 39 years. Table V shows there would be  
6 about 11,345 truck shipments through Wyoming on I-80,  
7 an average of 5.6 shipments per week, every week, for  
8 39 years.

9 PIC combined the current capabilities  
10 modal assumptions with the most likely highway and rail  
11 routes, using the same Highway and Interline computer  
12 models employed by DOE. A map showing these routes is  
13 attached as Figure 1.

14 The State of Nevada will be submitting  
15 extensive written comments on this draft Environmental  
16 Impact Statement for a high-level nuclear waste  
5 17 repository at Yucca Mountain. It is our hope that  
18 these comments and those of all others will be  
19 seriously considered, and that a reasonable No Action  
20 alternative, as opposed to the unreasonable and  
21 unrealistic ones contained in the draft document, is  
22 selected as the preferred action in the final  
23 Environmental Impact Statement. ] Thank you.

24 MR. BROWN: Thanks very much.  
25 Before I call the next speaker, let me

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