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13 MR. DILGER: Good afternoon. My name is Fred
14 Dilger. I am presenting this statement on behalf of the Clark
15 County Nuclear Waste Division.

16 The proposed action described in Modules 1 and 2
17 described by the Draft Environmental Impact Statement are
18 unprecedented Federal actions unlike any previous spent fuel
1... 19 shipping campaign. These differences suggest that a thorough
20 assessment of the impacts of the proposed action is necessary.

21 We believe the Draft Environmental Impact
22 Statement falls far short of this goal.

23 Section 1502.22 of the National Environmental
24 Policy Act calls for agencies to disclose the unavailability of
25 information in evaluating reasonably foreseeable significant

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1 cont.

1 adverse effects on the human environment.

2 The absence of operational safety performance
3 data for any component of the transportation system needed to
4 move waste from generator sites to Yucca Mountain is a major
5 gap in available information and should have been cited and
6 discussed in the DEIS.

7 The DEIS describes some -- some areas in which
8 gaps in information exist, but it does not make those gaps
9 clear.

10 Sections of the DEIS where the gaps in
11 information should have -- where there are gaps in information
12 should be highlighted and implications of these gaps and the
13 validity of conclusions of the DEIS should be thoroughly
14 discussed.

2...

15 One of these gaps in particular is the
16 description of the emergency management impacts. These are of
17 critical concern to Clark County.

18 NEPA obliges Federal agencies to examine the
19 direct effects of their programs on local communities. The
20 DEIS fails to accomplish this by failing to provide a thorough
21 description of the emergency response system necessary to
22 respond to the maximum reasonably foreseeable acts of the MRFA.

23 Discussion to have MRFA is so sparse that our
24 emergency response professionals did not feel they had enough
25 information to define their response requirements.

2 cont.

1 The DEIS should have provided a more thorough
2 description of the communications, security, packaging and
3 transportation systems deployed to mitigate accidents as well
4 as the MRFA.

5 No description of how the DOE will implement
6 emergency response sections of the Nuclear Waste Policy Act,
7 Section 180c is provided.

3...

8 Another gap in -- in information that's not
9 discussed -- Ginger's talk mentioned it; so as Mayor
10 Phillips -- is the problem of stigma.

11 To spite extensive advice and a assistance over
12 the last decade, the DOE has spurned public concerns about
13 stigma when preparing this DEIS.

14 Clark County, State of Nevada, Lincoln County and
15 a number of individuals have all expressed concerns about this
16 important topic.

17 Because the -- because stigma is a legally
18 cognizable injury, it's extremely important for communities
19 living along the transportation corridors.

20 Clark County's concerns about the potential
21 stigma effects of DOE's proposed action fall into four areas:
22 The first is public liability, the degree of stigma related to
23 the future marketability of land and products.

24 Hidden cleanup costs: It's often difficult to
25 assure buyers that estimated cleanups costs are adequate.

3 cont.

1 Lack of financing, also known as disinvestment.
2 The inability to obtain financing for the purchase of a
3 property that's being development.

4 Fear of accidents or future harms related to the
5 proximity, to the source of danger, the desire to reduce the
6 risk.

7 These are all stigma effects that have been
8 documented, in some cases by Department of Energy researchers,
9 and should have been addressed in the DEIS.

1 cont.

10 In 1995, the DOE indicated in a report cited as a
11 DEIS reference -- the report title is Nevada Potential
12 Repository Preliminary Transportation Study 1.

13 It indicated that input from the affected
14 counties would be a consideration in selecting a route through
15 Nevada to Yucca Mountain.

16 Based on the concerns I've described above, Clark
17 County believes that none of the implementing alternatives
18 proposed in the DEIS are acceptable without further study.

19 Clark County contends that without detailed
20 description of the packaging, handling, transportation and
21 mitigation systems necessary to implement the Yucca Mountain
22 transportation program, it's impossible to assess the impacts
23 of this program.

24 Thank you very much.

25 MR. LAWSON: Thank you, sir.