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### MEMORANDUM

RECEIVED

JAN 25 2000

EIS000968

**TO:** Wendy R. Dixon, EIS Project Management

**FROM:** Bob Andrews, Chairman, Clark County/LEPC 

**SUBJECT:** Clark County LEPC Comments on DOE's Draft Environmental Impact Statement

**DATE:** January 20, 2000

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Enclosed are the Clark County Local Emergency Planning Committee's comments to the draft EIS for Yucca Mountain.

Also enclosed is a Clark County LEPC membership list.

cc: Mike Cyphers, Coordinator, Henderson Emergency Management  
Don Burnette, Director, Administrative Services  
Dennis Bechtel, Manager, Clark County Nuclear Waste Division  
Fred Dilger, Principle Planner, Clark County Nuclear Waste Division  
Harry Kelman, Senior Management Analyst, Clark County Nuclear Waste Division

January 18, 2000

EIS000968

Clark County Local Emergency Planning Committee,  
Nuclear Waste Subcommittee  
C/O Clark County Office of Emergency Mgmt.  
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Ms. Wendy R. Dixon, EIS Project Manager  
M/S 010  
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Re: Clark County LEPC's comments on the DOE's Draft Environmental Impact Statement for Yucca Mountain.

Ms. Dixon:

1 The role of the Clark County Local Emergency Planning Committee (LEPC) is to plan for emergencies, which may effect Clark County, and to minimize undesirable consequences which may result. Obviously, the transportation of high level nuclear waste through our County is of grave concern, and requires major planning to prepare for, respond to, and safely mitigate any accidents that may occur. Our review of the Draft Environmental Impact Statement (DEIS) leaves us with many more questions than answers, and makes planning virtually impossible. Therefore:

The Clark County LEPC believes the Yucca Mountain Draft Environmental Impact Statement is an insufficient analysis of the impacts of the Yucca Mountain Project on Clark County because it fails to provide specific detail about the Maximum Reasonably Foreseeable Accident and because it fails to describe how section 180c of the Nuclear Waste Policy Act as Amended (NWPAA) will be implemented. |

What follows is a description of those areas in the DEIS which are lacking, not addressed, or simply misleading. This is not intended to address every page and every area of the two-volume DEIS, but to offer specific questions we have and areas we would like to see addressed before the final version of the DEIS is submitted.

2

Fiscal Impacts - [The DEIS does not adequately address the financial impact of the repository and the transportation there to. How can the LEPC prepare for emergencies when there is no starting point on fiscal impacts? Specific questions that need to be answered are:

1. What will it cost to monitor the transportation program for the life of the project?
2. What is the estimated cost to prepare for and respond to the maximum reasonably foreseeable accident (MRFA)?
3. Does the Price-Anderson Act, the Stafford Act or a combination of both covers the costs if an evacuation is necessary as the result of an accident? This needs to include long term shelter and business losses.
4. What are the financial impacts on our healthcare system? Do they have the equipment/training necessary to deal with the everyday effects of exposure? In the MRFA do we have enough hospital beds or providers? How much will it cost to prepare?
5. Much of the DOE document discusses Grant funding for costs anticipated with the development of Yucca Mountain. However, Grants are discretionary and Nevada would be competing with every State effected by transportation, should not a fixed funding source be identified?
6. Affected areas have no mass Community Warning System other than the Emergency Alert System. What will it cost to create a useful warning system to notify the public in the event of an emergency?
7. Public safety training is not addressed. In large communities you may have experienced Hazardous Materials Response Teams, but in most rural areas the first responders will be volunteers. On going training will need to be addressed for the life of the project.

3

The Maximum Reasonably Foreseeable Accident (MRFA) - The DEIS identifies the radiological results of the MRFA, but does NOT identify what the actual MRFA is in the body of the DEIS. A detailed description of the MRFA is necessary for any reasonable planning efforts. Furthermore, a description of other accidents/incidents that are less than the MRFA, but which effect and impact the emergency response system are necessary.

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Transportation Analysis - [There is no detailed transportation analysis in the DEIS. The document mentions possible alternatives in rail shipments, truck shipments and heavy-haul trucks without determining a preferred method or analyzing the advantages/disadvantages thereof.] Specifically:

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1. Weather conditions must be studied and planned for, some routes may not be accessible in winter. Who will decide when a shipment should not proceed?

6 ...

2. Population figures used in the DEIS to describe the population along the routes is from 1990 census. Clark County has been the fastest growing area of the country for the past 10 years. This would then effect the numbers in the exposure figures that are calculated.

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3. The study should identify special populations along proposed routes as well. The LEPC identified 37 schools, 23 hotels (6,000+ rooms), 1 major health care facility and 1 special event facility within ½ mile of the proposed routes.

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4. What are the operational characteristics of the proposed heavy-haul system? If heavy-haul trucks are used, how will they effect traffic? It could only move 25-35 miles per hour, on our highways the speed limits are 65 or 75 mph, how many accidents will this cause? Will it warrant additional lane construction? What about where the roads are only two-lanes? How often and by whom will these trucks be inspected? Does the inspection require special tools/equipment? If it breaks down who fixes it and are there special parts needed? Where do they come from? Is there additional radioactive exposure while it sits? Who measures it and with what equipment?

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5. The last several questions in number 4 also apply to legal weight trucks.

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6. A traffic safety study should be included.

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7. If a truck carrying high level waste is involved in an accident, who responds? Should local responders be trained and equipped or is it more logical to escort the vehicles with a response team?

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8. The State is responsible for providing for the security and safety of the proposed shipments. The DEIS does not address minimum security requirements, proper escort staffing, or inspection of vehicles entering the State.

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9. By not identifying specific routes for shipment, key issues were not addressed in the DEIS. For example, the Cal-Nev Fuel Pipeline runs parallel to the Union Pacific Railroad from the San Bernadino area into the Las Vegas Valley. These 14" and 9" fuel lines could cause significant impact in the event of a rail accident, and they are the main supply of all motor vehicle and aircraft fuels into Southern Nevada.

12

As an LEPC we can easily plan for a chlorine release. We have air modeling programs, mandated Risk Management Plans with worst case scenarios, even a DOT Guidebook with basic response information and evacuation distances. Why can't we do this for High Level Waste and the transportation thereof?

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This letter is an attempt to address the myriad of concerns identified by the Clark County Local Emergency Planning Committee when reviewing the DEIS. It is not meant to be comprehensive in addressing every concern found in the review. The DEIS is so insufficient in its analysis that it is useless as a planning document.

Respectfully Submitted,



Michael S. Cyphers, Chairman  
Clark County LEPC Nuclear Waste Subcommittee

CLARK COUNTY, NEVADA  
LOCAL EMERGENCY PLANNING COMMITTEE  
January 20, 2000

EIS000968

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