

OCT 19 2001

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18 MS. ARENDS: Joni, J-O-N-I, Arends,
19 A-R-E-N-D-S.

20 I'm here to talk about three different
21 issues: One is the transportation issues; one is the
22 public process; and the third one is the environmental
23 justice issues.

24 Now, I am the Waste Programs Director for
25 Concerned Citizens for Nuclear Safety in Santa Fe, New

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1 Mexico, and I have been working on this issue, on these
2 issues for 13 years, so I have a lot of expertise with
3 regard to these kinds of issues with the transportation
4 and the waste issues. With regard to the
5 transportation, I wanted to make this part of the
6 record. In 1989, CCNS and the New Mexico Department of
7 Health did a survey of the emergency responders in New
8 Mexico, along the WIPP route from Raton, New Mexico,
9 down to Carlsbad.

10 We interviewed -- we received surveys from
11 236 emergency management -- emergency management
12 services survey participants. Many of them are first
13 responders. And basically, the results of these

14 surveys are that most of the emergency responders in
15 New Mexico are volunteers, and that they need more
16 equipment, more training, and more written policies and
17 procedures. They will respond to radioactive and
18 hazardous material shipments, but there is concern that
19 they're not trained.

20 This is a suggestion that the Department of
21 Energy or the Nevada's Department of Health conduct a
22 similar survey to find out how prepared the emergency
23 responders in Nevada are. I haven't done any research
24 specifically on how many volunteers are on the route,
25 the proposed routes here, but I think that probably

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1 with the Yucca Mountain shipments, you need to survey
2 both along the -- excuse me -- the truck routes but
3 also along the train routes, the proposed train routes,
4 to find out what, what's really needed, because when
5 you look at this, you see that over half of the
6 emergency responders in New Mexico need more training
7 and equipment and written policies and procedures.

8 And one of the important things about this is
9 that DOE holds out that the WIPP transportation system
10 as being the premier system, and they have been charged

11 with training -- they give grants to the state of New
12 Mexico for this training and it's inadequate. And
13 that's important for the people of Nevada to also know,
14 that DOE needs to do a better job to make sure that the
15 emergency responders -- and in this situation, in
16 particular, because the proposed transport routes are
17 basically, they converge at St. Louis, or Kansas City,
18 and they come across the west, that we need to know
19 that those people along those transportation routes are
20 adequately trained.

21 Another problem with the New Mexico WIPP
22 system or the WIPP system is that the transcom, the
23 satellite system, has been off and on for the last
24 couple of months. The people of Nevada need to
25 understand that DOE doesn't hold up to their promises

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1 all the time with regard to the transportation issues.

2 And that, that is of grave concern.

3 So, I brought a CD of this power point
4 presentation, along with a copy of this and I'm going
5 to keep the color copy, but give you this black and
6 white one, so that's requested that that be part of the
7 record.

8 The second point is the public process.
9 CCNS, in particular, has a lot of concerns. We've been
10 receiving the e-mail notices about these public
11 meetings, about this, and to learn that hearings are
12 being announced the same day they're being held is a
13 disgrace, that you have thousands of pages of documents
14 to look through, and there isn't adequate time for
15 people to make an informed public comment about these
16 issues. I just can't even express to you that this is
17 really bad public process.

18 I know, I realize that DOE's in a hurry, but
19 the people of Nevada need the opportunity to voice it.
20 And I know that it will be spun in such a way before
21 Congress to say that everything we held 30 public
22 meetings and these many people showed up, and it's
23 going to look really nice on all the charts and all the
24 presentations before Congress, but there's a lot of
25 concern that the people haven't had a real opportunity

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1 for public input into this process.

2 The third point is the environmental justice
3 issues, and also both from a race perspective and also
4 from the income levels. We went for a tour of Amargosa

5 Valley on Wednesday and saw that there's a lot of
6 agriculture. There's a lot of farm animals. There's a
7 lot of pecan -- excuse me -- pistachio farms, and to
8 look at the demographics that are in the EIS, it
9 doesn't reflect what's really going on out in the
10 valley.

11 And I -- for all of the millions of dollars
12 that DOE has spent on this project to not understand
13 who lives within the vicinity, you know, that people
14 can walk out of their homes and look at Yucca Mountain,
15 and DOE hasn't counted those people or included those
16 people in the demographics, is, it's, it's neglectful
17 on DOE's part. And also, the income levels of the
18 folks and also the racial profile of those folks need
19 to be included.

20 And also, that with regard to transportation
21 issues, DOE should go back and look at the
22 environmental justice issues along the transportation
23 routes because most of these routes are through the
24 backyards and the back, the homes of very poor and
25 minority people living along the transportation routes.

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1 And DOE should be required to do an analysis of who

2 lives along the transportation routes and not
3 necessarily within a certain amount of, maybe a mile,
4 but we know from our own work that, and the work of
5 other environmental groups, that over 50 million people
6 live within half a mile of these routes, the proposed
7 routes. And that's going to be a huge impact on the
8 transportation.

9 And then the whole testing of the containers,
10 and the fact that the NRC, the Nuclear Regulatory
11 Commission, has set up a process by which these
12 containers are tested, but like with the WIPP shipments
13 or the WIPP testing, the burn test needs to be done
14 first on these containers, because most likely accident
15 is going to be involving some kind of truck that
16 involves either propane or another liquid that burns at
17 a hotter temperature than the 1,475 degrees that these
18 containers are tested at. So you have to have the burn
19 test first, where you burn the container and the metal
20 fatigue starts to set in, and then you drop it, or you
21 do some -- you do the other testing after the metal's
22 been fatigued, because that's a real-life scenario, you
23 know, where you're going to have the accident and
24 there's going to be the fire first.

25 And then also, the crush tests, you know.

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1 The other thing is, is that once these containers start
2 to be radiated, then the metal fatigue will happen as
3 well, because these containers, these shipments are so
4 hot, that the metal fatigue will even be sooner. So
5 even though you do the fire tests first, you're going
6 to be burning something that hasn't been irradiated
7 yet, so you need to take into account the fact of their
8 radiation and what's going to happen in a fire test.
9 So -- I'm sorry, I'm tired -- but the important point
10 about the fire test is that there's many liquids that
11 burn above 1,475 degrees, including propane. So in the
12 west, we have a lot of propane.

13 So, those are my comments.

14 MS. GIL: Thank you very much for your
15 comment.

16 MS. ARENDS: Thank you.