Presentation to the Nuclear Waste Technical Review Board
July 10, 2000
Fred Dilger (702) 455-5194
fcd@co.clark.nv.us

AULG DEIS Transportation Concerns

Cumulative Impacts

- 40 CFR 1508.7 ...Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.
- DOE is obligated to consider all past, present and reasonably foreseeable actions.
- The approach in the DEIS does not consider the collective impact of all actions.
- Does not address the cumulative impacts of other nuclear waste destined for the Nevada Test Site

Transportation Assessment (National Concerns)

- The DEIS does not evaluate a full range of modal alternatives
- DOE assumes a "single-route" strategy for national transportation and does not compare mode alternatives
- The analysis of transportation uncertainty does not include accurate data for the casks, trucks, or rail
- Fails to address the impact of human and institutional factors on uncertainty
- Does not identify the safest mode route combination for the national shipment campaign, cross-country and in the destination state

Transportation Assessment (AULG Concerns)

- Lacks an "implementing alternative" to analyze issues such as route, mode, etc. to test the system and determine potential impacts (see Map)
- Inaccurate data used to evaluate risk
- Does not address transportation issues traditionally evaluated in an EIS (e.g., congestion, infrastructure, accidents, weather, natural events)
- Avoids consideration of other "risks" by which the public makes decisions (e.g., economy, property values, etc.)
- Does not provide a thorough description of intermodal handling operations

Draft EIS Transportation Concerns:

- Cumulative Effects
  - Does not consider effects at the local and county level
  - Ignores the disposal of LLW at the Nevada Test Site
- Transportation Assessment Concerns
  - National
  - AULG
  - Program-related
  - Emergency Response

Transportation Assessment (Program Concerns)

- Fails to describe how an "implementing alternative" could be selected
- The DEIS fails to address how human health risk will enter into decision-making
- Avoids discussion of the construction, operation, and maintenance of the transportation system
- Doesn't discuss schedule particularly when transportation system issues will be considered and resolved
Emergency Response Concerns

- "No there, there"
- Not enough information provided by the DEIS to understand impacts on urban and rural communities
- No description of the Maximum Reasonably Foreseeable Accident (MRFA)
- No discussion of FEMA's role

Conclusions

- NWTRB should ask DOE to address NRC comments
- DEIS is not an adequate assessment
- DEIS contains poor data, poorly analyzed
- The DEIS is not a comprehensive or thoughtful analysis
- Presents a misleading and incomplete story to Congress and the public