State of Nevada Transportation Recommendations

(1) A comprehensive approach to risk assessment, risk management, and risk communication;
(2) Development of a preferred transportation system;
(3) Full-scale, physical testing of shipping casks;
(4) Accident prevention and emergency response;
(5) Adequate attention to terrorism and sabotage risks.
Recommended NEPA Process

• Step 1 – Draft Transportation Plan
  – Symmetry between national and Nevada components
  – Identification of modes and route alternatives

• Step 2 – Scoping for a Programmatic EIS
  – Draft transportation plan becomes the basis for scoping
• Step 3 – Draft Programmatic EIS
  – Fully integrates national and Nevada programmatic elements
  – Provides structured opportunities for public and stakeholder comments/involvement
• Step 4 – Final Programmatic EIS
  – Identifies preferred system alternatives (mode; routes; at-reactor mode choices; Nevada access mode choices – LWT, HHT, rail; Nevada preferred rail access corridor, if applicable)

• Step 5 – Record of Decision
  – Programmatic Decisions on Modal choices, Route(s), Nevada rail or highway access, etc.
• Step 6 – Tiered EISs for sub-components of the transportation system (HHT operations, rail alignment, intermodal facilities, etc.)
DOE’s Caliente FR Notice: Most Recent Example of DOE’s Flawed Approach

- Lack of a systems approach to transportation planning;
- Corridor selection and mode selection decisions juxtaposed;
- Corridor selection decisions not supported by detailed comparative analyses;
- No State or stakeholder involvement or consultation;
• Disconnect between national mode/route and Nevada mode/route decisions;
• Illegal NEPA segmentation.