

Department of Comprehensive Planning

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April 29, 2009

Mr. Frank Moussa
U.S. Department of Energy
OCRWM Office of Logistics Management
1000 Independence Avenue, SW
Washington, DC 20585-0001

Re: Comments on National Transportation Plan, DOE/RW-0603, Revision 0

Dear Mr. Moussa:

These comments are hereby submitted on behalf of Clark County's Yucca Mountain Nuclear Waste Advisory Committee, and represent the collective position of the Committee. The Committee consists of representatives from Clark County, each of the five cities within Clark County, the Nevada Department of Transportation, the Regional Transportation Commission of Southern Nevada, Moapa Band of Paiutes, and citizen members. We would appreciate these comments being included in the record separate from forthcoming Clark County staff comments. The following comments focus on gap areas that should be addressed in future versions of the National Transportation Plan. While the focus of these comments is on Clark County, we believe that they are applicable not only here, but also to jurisdictions across the country, and therefore relevant and appropriate to be addressed in the National Transportation Plan.

As a general comment, although this is not the first draft of the plan to be released by DOE, and many comments have been solicited and provided, the current version of the plan lacks detail, specificity, and any evidence the previous comments were incorporated. This is surprising given the license application has been filed, much work has been done with state regional groups and other stakeholders, the TAD canister specifications are known, the SEIS and Rail Corridor EIS have been adopted by the NRC through the licensing proceeding, and the Nuclear Waste Policy Act 180(c) policy document has also been reviewed and commented on extensively.

Routing in Nevada

Route identification is a key element in determining the relative impact of the Department of Energy (DOE) plan to move nuclear waste from all U.S. nuclear power plants and military nuclear facilities to Yucca Mountain, Nevada. While there are minimal details about specifics with regard to routing, it appears that the Las Vegas Valley is being asked to carry a disproportionately large burden resulting from the DOE's shipment campaign. For example, should the Caliente Rail Line construction be delayed, or never be constructed, the default plan for federal highway transport has serious implications for an increased number and frequency of shipments through the Las Vegas Valley. Yet, this

contingency is not adequately addressed in the current version of the plan. If the “mostly truck” scenario occurs, given the road configuration and the current laws and regulations related to the selection of roads for nuclear waste movement, Interstate 15 and the US 95 Freeway will be chosen. This means that for five decades, shipments will potentially impact the more than 2 million residents of the Las Vegas Valley, as well as the hundreds of thousands of visitors located on the internationally-known Las Vegas Strip.

Should the Caliente Rail line be constructed, the shipments from the northwest, mid-west, and eastern U.S. would travel by that route, and significant amounts of spent fuel and radioactive waste would still travel on a rail route bisecting the Las Vegas Valley within a quarter mile of most of the Las Vegas Strip. This would include all nuclear waste from California, Arizona, New Mexico, Texas, and Louisiana.

Public Safety Concerns

Critical links (regardless of transportation route or mode) to public safety requirements have not been adequately addressed in the National Transportation Plan. While DOE indicates in the plan that an accident involving a shipment to Yucca Mountain is “unlikely,” DOE’s EIS documents do recognize the possibility of accidents, some with a release of radioactive material. For example, the Supplemental EIS estimates a potential for truck accidents of one in 500 shipments. Given that the shipment campaign will likely extend 50 years or more, there is a potential for 5 to 10 truck accidents alone. Both rural and urban emergency services will be impacted in terms of preparedness, response, and clean-up should such an accident occur. The DOE does not adequately address this in its transportation plan. For example, there is insufficient detail from a first responder and emergency management perspective with regard to how different types of shipments would be handled, depending on the type and contents of the canisters (e.g. bare fuel or aged fuel). Notification procedures are also at best unclear and at worst completely inadequate. A critical component for effective emergency management is communication. The communication portion of the plan is woefully inadequate, and should be given significant focus in a future draft. An adequate description of the process for coordination, preparedness and response activities for States, tribes and local governments should be included in a future draft of the plan. Finally, better linkages to preparedness, response and clean-up coverage in relationship to the Department of Homeland Security, and protection and funding under 180(c) and/or the Price-Anderson Act should be fully addressed.

Costs

Another obvious gap area in the plan is costs. The true costs of shipments for all routes, modes, and types of shipments should be included in the plan, not just for Nevada, but nationwide. These costs have been estimated, and are known to DOE and have been published in the DOE’s Total System Life Cycle Cost document. Not only should the true costs be detailed in the transportation plan, but the funding sources and consequences of not receiving funding (i.e., mostly rail vs. mostly truck) should be addressed.

Thank you for the opportunity to comment on this critical element of the Yucca Mountain Project.

Sincerely,

Irene L. Navis, Chair
Yucca Mountain Nuclear Waste Advisory Committee