



County of Inyo
Planning Department

P. O. Drawer L, Independence, CA 93526
(760) 878-0447, fax (760) 878-0382

January 3, 2005

TO: Barbara Byron, Special Advisor, California Energy Commission

FROM: Andrew Remus, Project Coordinator, Inyo County

RE: **Yucca Mountain Transportation Issues & Joint Concerns
of Inyo County and the State of California**

Inyo County is seeking answers to the following series of questions regarding use of SR127 for transportation of Yucca Mountain HLW/SNF.

- Who within the State would make a decision on the use of SR127 as an Alternate Route for purposes of Yucca Mountain shipments?
- Which State Agency would be Lead CEQA Agency conducting the joint NEPA/CEQA Analysis needed to evaluate the impact of use of SR127?
- Which State agency would administer expenditure of NHPA Section 180[c] funds?
- Which counties are eligible for Section 180[c] assistance from the State?
- Timing of shipments (per the queue for Yucca Mtn shipping) will impact when specific counties need Section 180[c] assistance. If SR127 is a candidate route for Yucca Mountain Shipments, might Inyo and San Bernardino counties may need Section 180[c] assistance in conjunction with all California shipments?
- Will California take issue with the transport of Hanford HLW and non-California SNF through the State?
- Are there State-adopted policies regarding routing of HLW/SNF that will play into the State's position on routing of Yucca Mountain waste through California?

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- Who within the State would make a decision on the use of SR127 as an Alternate Route for purposes of Yucca Mountain shipments? *State Energy Commission*
- Which State Agency would be Lead CEQA Agency conducting the joint NEPA/CEQA Analysis needed to evaluate the impact of use of SR127?
CALTRANS - (CH&M Services)
- Which State agency would administer expenditure of NWPA Section 180[c] funds? *CEC (WGA) C.E. Smith*
- Which counties are eligible for Section 180[c] assistance from the State?
Inyo, San Bernardino, Kern, Los Angeles, Orange, Santa Ana, San Diego, Santa Clara, Stanislaus, and Tulare
- Timing of shipments (per the queue for Yucca Mtn shipping) will impact when specific counties need Section 180[c] assistance. If SR127 is a candidate route for Yucca Mountain Shipments, might Inyo and San Bernardino counties may need Section 180[c] assistance in conjunction with all California shipments? *Advised to CEC*
- Will California take issue with the transport of Hanford HLW and non-California SNF through the State? *Yes*
- Are there State-adopted policies regarding routing of HLW/SNF that will play into the State's position on routing of Yucca Mountain waste through California?
State-adopted policies regarding routing of HLW/SNF

State-adopted policies regarding routing of HLW/SNF



County of Inyo

Planning Department

Yucca Mountain Repository Assessment Office
P. O. Drawer L, Independence, CA 93526
(760) 878-0447, FAX (760) 878-0382

INYO COUNTY & THE YUCCA MOUNTAIN NUCLEAR WASTE REPOSITORY

Inyo County is impacted by four U.S. Department of Energy nuclear programs:

- The proposed high-level nuclear waste/spent nuclear fuel repository at Yucca Mountain
- Transportation of low-level nuclear waste to the Nevada Test Site through Inyo County
- Transportation of plutonium waste from the Nevada Test Site to a repository in New Mexico
- Radionuclide contamination of groundwater flowing from the Nevada Test Site

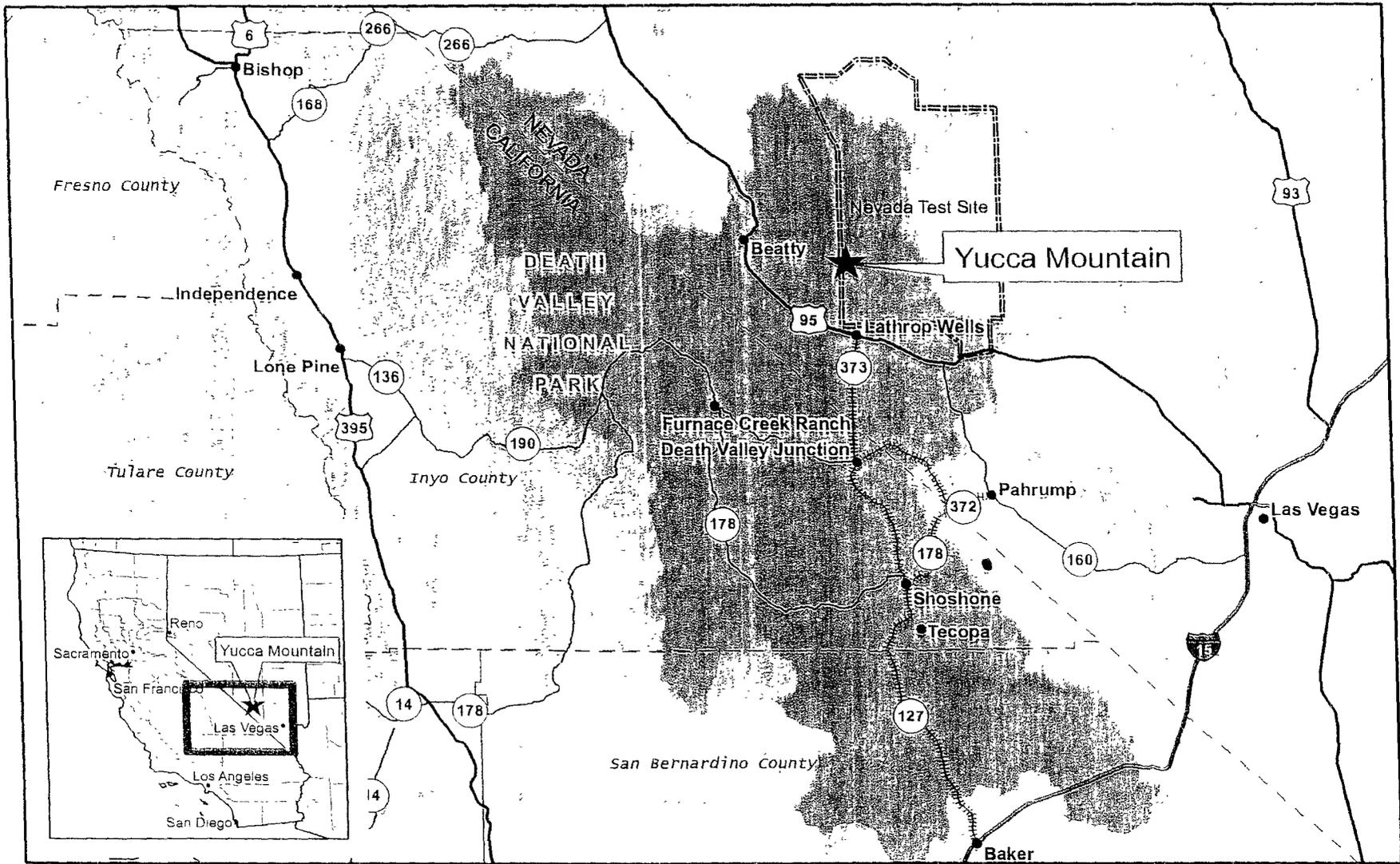
Nuclear waste disposal operations at Yucca Mountain and the Nevada Test Site will put **large volumes of nuclear waste on some of the County's most heavily traveled and poorly safeguarded rural routes** for up to 40 years. Two programs - the Yucca Mountain Project and the Nevada Test Site - have **the potential to irreversibly contaminate essential groundwater resources** used by County communities, tribal members, commercial operations and government agencies.

Inyo County is an *Affected Unit of Local Government under the Nuclear Waste Policy Act*. As an Affected Unit of Local Government we receive annual funding from Congress to conduct oversight of the Yucca Mountain Project. Since attaining this special federal status in 1991, Inyo County has conducted significant independent hydrologic research, including execution of multi-million dollar federal research grant designed to characterize groundwater flow paths in the vicinity of Death Valley National Park and to **determine if Death Valley and local residents are endangered by the proposed repository**. The Nuclear Waste Policy Act requires that the Yucca Mountain Repository be capable of isolating radioactive materials from humans for the first 10,000 years of repository operation.

Inyo County has serious concerns about the proposed Yucca Mountain Nuclear Waste Repository. Originally envisioned as a remote, dry site where the geologic conditions could isolate nuclear waste from humans for tens of thousands of years, decades of study have led many experts to conclude that **the mountain may be incapable of containing the waste and its by-products for more than a few decades or centuries.**

Further, while the U.S. Department of Energy has yet to designate routes for Yucca Mountain shipments, DOE has indicated that the current system of low-level nuclear waste routes will be used as the starting point for the planning of Yucca Mountain shipments. Since Inyo County currently hosts - in some years - up to 25% of all low-level nuclear waste shipping into the Nevada Test Site, it is fair to assume **the County will be impacted by the Yucca Mountain shipping program.**

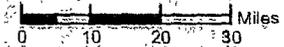
We are now conducting a **nuclear waste transportation risk assessment** to evaluate whether or not DOE-planned shipments of high-level nuclear waste and spent commercial reactor fuel to Yucca Mountain could pose a risk to County residents and resources. Under Federal Department of Transportation rules, **the State of California has the authority to designate Inyo County's State Highways as suitable for Yucca Mountain shipments**. The State will receive funding to mitigate related impacts, provided through Section 180[c] of the Nuclear Waste Policy Act.



Legend

-  Low Level Waste Routes
-  Death Valley Watershed
-  Death Valley National Park

Yucca Mountain and Death Valley Watershed



May 2006
Inyo County
Z:\projects\arcgis\yucca_mtn\yucca letter 24 may 2006.mxd

From: "Barbara Byron" <Bbyron@energy.state.ca.us>
To: <Rpatrick@chp.ca.gov>, <SSchnoebelen@chp.ca.gov>, <tilyer@chp.ca.gov>, <stepekj@cwpswrch.ca.gov>, <charleen_fain-keslar@dot.ca.gov>, <aburow@dtsc.ca.gov>, <JWong@dtsc.ca.gov>, "John Parrish" <cgshq.ca.gov.conservations@energy.state.ca.us>, "Hisam Baqai" <Hbaqai.ca.gov.waterboards@energy.state.ca.us>, "Harold Singer" <hsinger.ca.gov.waterboards@energy.state.ca.us>, "Bob Pierotti" <Pierotti.ca.gov.water@energy.state.ca.us>, <Ben_Tong@oes.ca.gov>, <chauge@water.ca.gov>
Date: 7/11/2006 3:56:03 PM
Subject: Inyo County Meetings in Sacramento on the Proposed Yucca Mountain Repository

To: The California Yucca Mountain Technical Review Team

From: Barbara Byron
Coordinator

Re: Inyo County Meetings in Sacramento Regarding the Proposed Yucca Mountain Repository

Inyo County representatives are arranging meetings in Sacramento for July 24, 25, or 26 to discuss Inyo County's Yucca Mountain program and potential transportation and groundwater impacts in California. Inyo County may be contacting your agency to arrange such a meeting. The Inyo County representatives will include County Supervisors and plan to discuss:

- (1) findings from Inyo County's research on groundwater and transportation impacts,
- (2) future Inyo County research that may impact the State, and
- (3) future coordination between Inyo Co. and the State of California with respect to the proposed Yucca Mt. high-level waste repository

Rather than meeting collectively with representatives from our agencies in a single meeting, which seems more efficient, they prefer meeting individually with each of the California agencies. Please let me know, if possible by COB tomorrow, whether your agency is available to meet with them individually and, if so, the names of individuals in your agency who might be appropriate for such a meeting.

The U.S. Department of Energy (DOE) has indicated that they expect to submit a license application for the proposed Yucca Mountain repository to the U.S. Nuclear Regulatory Commission in Summer 2008. Many consider this schedule to be highly optimistic. DOE recently said the earliest that repository could be constructed and begin operation would be 2018.

A summary of California positions and issues regarding the proposed repository is provided below.

The California Yucca Mountain Technical Review Group—an interagency group of 13 California water quality, transportation and environmental agencies, coordinated by the Energy Commission—concluded that:

1. Approval of the Yucca Mountain Site is premature given the many unresolved issues regarding potential transportation and groundwater impacts in California.
2. California's Inyo and San Bernardino Counties contain major portions of the aquifers through which radionuclides could leak from the proposed Yucca Mountain repository (Yucca is within 17 miles from Inyo County and less than 20 miles from Death Valley National Park—a pristine park visited annually by about 1.25 million tourists).
3. DOE's proposal to transport 70,000 metric tons of spent fuel from nuclear reactors throughout the U.S. to the Yucca Mountain would have major transportation impacts in California. For example, Nevada estimated, using DOE's Final EIS on Yucca Mountain, that the maximum total shipments to Yucca Mountain over 38 years could be as high as 108,544 truck shipments (if mostly by truck) for the U.S. About 82% of these shipments could be routed through California to Yucca Mountain, averaging 2.346

shipments annually Over the last ten years, spent fuel shipments in California average less than 1 truck shipment per year

If you have any questions, please phone me at 916-654-4976. Thanks

Barbara Byron