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Memorandum

To: Robert A. Laurie, Commissioner
California Energy Commission
1516 Ninth Street
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Date: January 21, 2000

File: 135

CALTRANS. DIST. 9
2000 JAN 25 PM 1:59

Attention: Barbara Byron

From: **DEPARTMENT OF TRANSPORTATION
TRANSPORTATION PLANNING - MS-32**

Subject: California Department of Transportation's Review of the Federal Department of Energy's (DOE) Draft Environmental Impact Statement for the Proposed Federal High-Level Nuclear Waste Repository at Yucca Mountain, Nevada

Thank you for the opportunity to review and comment on this Draft Environmental Impact Statement (DEIS) for the proposed Yucca Mountain, Nevada repository. The California Department of Transportation (Caltrans) Headquarters offices of Maintenance and Transportation Planning, and Caltrans District 9 and District 8 have reviewed this document. We have the following recommendations and comments on this proposal:

- The DEIS is inadequate because it does not specifically identify the routes (primary, secondary, or emergency response) or the mode (truck or rail) of transport. The DEIS rail analysis assumes ultimate delivery to the proposed repository will be via an unconstructed rail line in Nevada, or by heavy-haul truck routes exclusively within Nevada. Present regulations require shipping of High-Level Nuclear Waste (HLNW) on specifically defined highway routes, primarily the Interstate highway system, and rail routes determined by the industry. Primary, secondary and emergency routes and modes of transport need to be identified so that project impacts can be reasonably evaluated. If intermodal terminals are going to be used to transfer shipments from rail to truck or vice versa, then these terminal locations need to be identified and associated impacts evaluated. Impacts to non-Interstate routes outside Nevada have not been addressed in this document. Alternative/non-Interstate routes need to be analyzed now so that the Yucca Mountain site selection can be evaluated as well as the potential for impacts along these corridors. All types of routes, alternative routes and the modes of transport need to be identified. A thorough analysis of all the potential impacts resulting from these route and mode selections with supporting analysis data needs to be completed. The use of the RADTRAN model for estimation of potential radiological exposures is not appropriate on non-Interstate routes without significant adjustments.
- This Draft Environmental Impact Statement (DEIS) does not sufficiently discuss the proposed number of shipments, the characteristics of the shipments including their gross

weights, or the emergency-response characteristics of various routes and their locations. This DEIS fails to provide analysis of the routes to the repository or the potential environmental impacts, costs or risks involved in the transport of these wastes along these corridors. A complete environmental review needs to be conducted with supporting environmental documents and supporting analysis work (i.e., structural and geometric road characteristics, emergency response characteristics, socio-economic impacts) for all proposed and alternative routes. This DEIS needs to be amended to supply the necessary information about specific routes and potential alternative routes or new route construction, the existing route characteristics (geometric and structural), the mitigation needed to upgrade the proposed routes (including costs) to meet the various needs of these High-Level shipments, the emergency preparedness and response characteristics along the transportation corridors, the socio-economic impacts caused by use of these proposed and alternative routes, the risk involved in the transport of HLNW, and the consequences should major accidents occur in transport or at the repository.

- Some routes leading to the Nevada Test Site/Yucca Mountain area are heavily traveled tourist and recreational routes. These routes can be greatly impacted by increased truck traffic. Increased truck traffic (especially those hauling nuclear waste) could influence the safety, reliability and congestion characteristics of these routes. Additionally, none of these non-Interstate routes are suitable for the safe and efficient transport of HLNW. None of these routes were designed for heavy trucks, high truck volumes, or quick emergency response.
- Caltrans is troubled by the lack of alternatives presented in this DEIS. We strongly urge agencies, organizations and individuals with expertise in nuclear waste disposal to closely examine whether there are no alternative courses of action available to DOE except the use of the Yucca Mountain repository. If alternatives are available, their discussion and evaluation should be presented in this DEIS.
- California would be significantly impacted by proposed shipments of HLNW through the state from internal sources, foreign sources, Oregon and Washington to the proposed Yucca Mountain repository. These shipments could have a significant impact on California highways, the involved communities, and the California natural and human environment. Caltrans will need to do a thorough review of any proposal to ship HLNW to determine the infrastructure improvements that will be required as well as the additional costs of maintenance, operations, emergency response, additional personnel, equipment, etc. DOE's support of the following issues will be important and necessary.

Financial Support for highway and rail improvements, maintenance and rehabilitation; and for training, equipment, materials, personnel and coordination at least three years before the first shipment to insure the preparedness of involved agencies.

Training and Planning and Preparedness sessions for state and local jurisdictions near shipment routes.

Route Coordination with state and local jurisdictions, and route identification for each reactor/generator site to the repository at least three years before anticipated shipments.

Review of Accident and Terrorism responses and responsibilities of all involved.

Coordination and the Supply of Equipment for responses, tracking, record keeping and communications.

A Prior Commitment for Needs Assessment by state and local agencies for safety improvements, signing, signals, emergency crews, equipment, training, overall route improvements (rehabilitation, reconstruction and improvements).

Formation of a Working Committee of state and local jurisdictions at least five years prior to the first shipment to facilitate coordination, cooperation, communications, and training.

- Although the U. S. Department of Transportation and the DOE have had a successful 25-year history of safely transporting and disposing of nuclear waste, close work and cooperation with all agencies involved with this waste management program will better insure another 25 years of success.
- Caltrans will continue to cooperate, communicate, and coordinate with the Department of Energy (DOE), the California Energy Commission, the Western Governors Association, and all agencies and organizations involved in the movement and disposal of nuclear waste.

If you have any questions, please contact me at (916) 653-1818 or Bill Costa at (916) 653-9689.



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cc: Allan Hendrix