

**STATEMENT OF SUSAN ZIMMERMAN ON BEHALF OF  
ROBERT R. LOUX, EXECUTIVE DIRECTOR OF THE STATE OF NEVADA  
AGENCY FOR NUCLEAR PROJECTS, REGARDING THE  
U.S. DEPARTMENT OF ENERGY'S DRAFT ENVIRONMENTAL IMPACT  
STATEMENT FOR A GEOLOGIC REPOSITORY FOR THE DISPOSAL OF  
SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE AT  
YUCCA MOUNTAIN, NEVADA**

**PRESENTED AT THE PUBLIC HEARING IN  
LONE PINE, CALIFORNIA  
NOVEMBER 4, 1999**

In order for people to participate in the National Environmental Policy Act (NEPA) process, they must first be afforded the opportunity to know that a major federal action has the potential to impact them and their communities. While the U.S. Department of Energy (DOE) is conducting public hearings in various communities in Nevada and around the country, DOE has made no effort to inform citizens and public officials of the relevance of the draft Environmental Impact Statement (EIS) to them and their states and communities.

The notices for this public hearing, for example, refer only to a draft EIS for a radioactive waste repository at Yucca Mountain, Nevada. They do NOT indicate that people in Inyo and San Bernadino counties and other parts of California stand to be significantly impacted by radioactive materials shipments as a direct result of the Yucca Mountain program.

One can only conclude that such an oversight is intentional and designed to suppress public interest in the project and participation in the public hearings.

Not only is the noticing for the public hearings deficient, but the draft EIS itself fails to identify the cross-country rail and truck routes used in DOE's transportation impact analysis, and fails to identify potential transportation routes to Yucca Mountain through California. The document further fails to provide a meaningful analysis of the potential impacts on California of rail and truck transportation to the proposed repository.

A 1996 study prepared for the State of Nevada by Planning Information Corporation (PIC) identified routes to Yucca Mountain through California, which might be used by DOE and its contractors under a consolidated southern routing strategy. Under this approach, the most likely east-west highway corridors would be I-44 from Missouri to Oklahoma, I-40 from Tennessee to California, and I-15 from California to Nevada. The most likely east-west rail corridor would be the Santa Fe-Burlington Northern line from Kansas City to San Bernardino, connecting with the Union Pacific from San Bernardino to Nevada. These routes are shown in Attachment 1.

Using the shipment numbers in the draft EIS and the routing study prepared by PIC, the State of Nevada has developed a preliminary estimate of potential legal-weight truck shipments

through California to Nevada. Table 1 shows that 74,000 truck shipments, about three-quarters of the total, could traverse Southern California under DOE's mostly truck scenario. There could be an average of five truck shipments through California every day, seven days a week, for 39 years.

The DEIS evaluates a mostly truck scenario and a mostly rail scenario. Nevada believes that the final EIS must evaluate a third transportation scenario based on the current transportation capabilities of reactor and storage sites. Under the "current capabilities" scenario, there could be more than 26,000 truck shipments ( Table 2) and more than 9,800 rail shipments (Table 3) through California. Under this scenario, California would receive an average of two truck shipments per day and four to five rail shipments per week for 39 years.

This potential level of shipments through California certainly constitutes a significant impact which should have been identified and evaluated in the draft EIS.

Nevada believes that DOE has violated NEPA by concealing crucial information used in the draft EIS. Absent this information, persons affected by the transportation impacts of the proposed action have no way of determining the legal sufficiency of DOE's analysis. Moreover, DOE's attempted concealment of the shipment routes is a deviation from DOE's past practice of identifying the most likely transportation routes in NEPA documents, such as the Waste Isolation Pilot Plant (WIPP) EIS and Supplemental EIS. This action can only diminish public confidence in DOE's ability to safely transport these highly radioactive materials.

The State of Nevada will be submitting extensive written comments on this Draft Environmental Impact Statement for a high-level nuclear waste repository at Yucca Mountain. It is our hope that these comments and those of all others will be seriously considered, and that a reasonable No Action alternative (as opposed to the unreasonable and unrealistic ones contained in the draft document) is selected as the preferred action in the Final Environmental Impact Statement.

ATTACHMENT 1

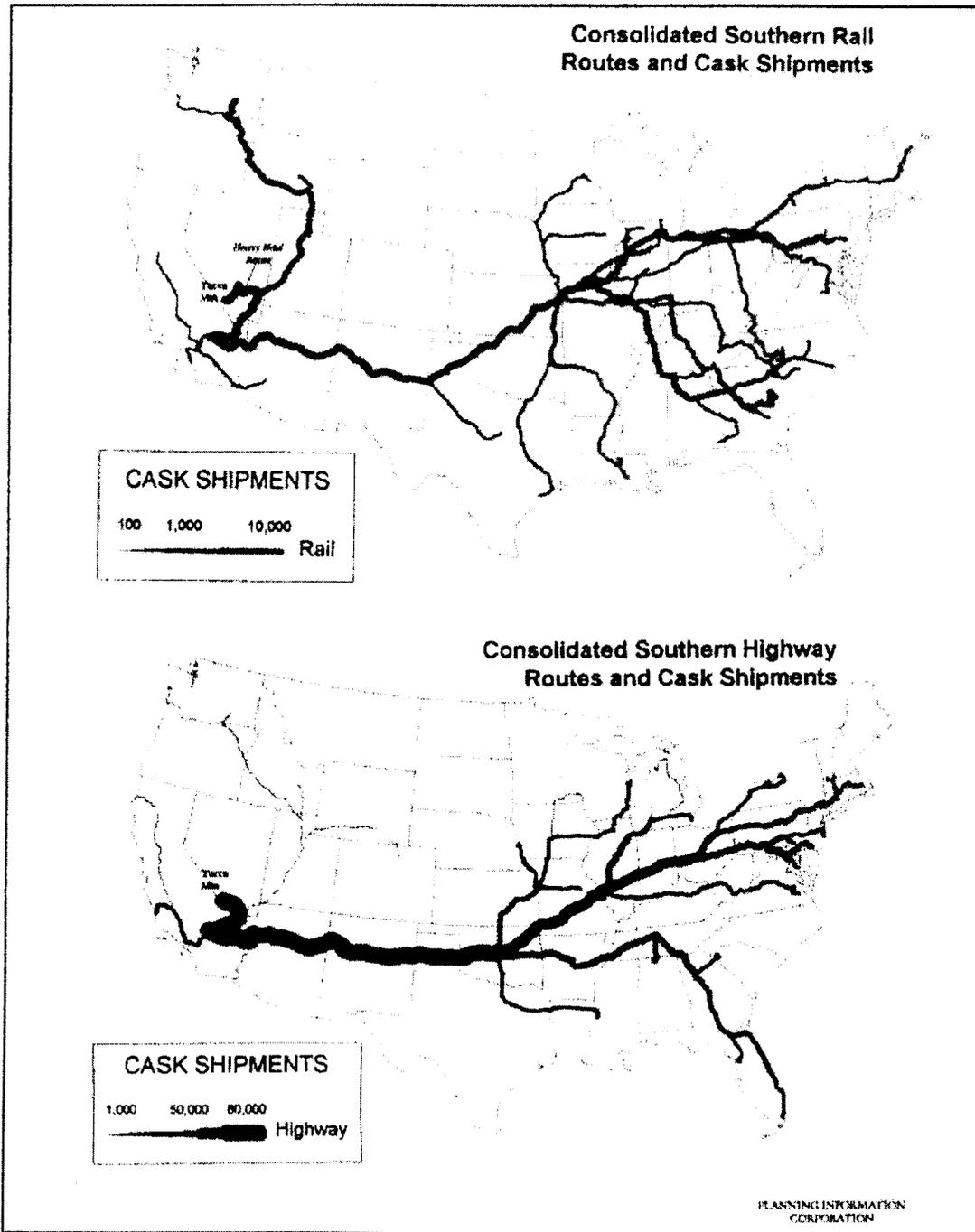


TABLE 1

<b>YMDEIS TRANSPORTATION IMPACTS</b>	
<b>MAXMUM SHIPMENTS THROUGH SOUTHERN CALIFORNIA</b>	
<b>NATIONAL MOSTLY TRUCK SCENARIO, DOE MODULE 2</b>	
<b>CONSOLIDATED SOUTHERN ROUTING</b>	
CALIFORNIA TOTAL	74050
CORRIDOR I-5/I-10/I-15	5258
Humboldt Bay(CA)	44
Rancho Seco(CA)	124
Diablo Canyon(CA)	1308
San Onofre(CA)	1284
Palo Verde(CA)	2498
Corridor Subtotal	5258
CORRIDOR I-40/I-15	68792
Browns Ferry(AL)	2067
Farley(AL)	1126
Arkansas(AR)	963
Haddam Neck(CT)	255
Millstone(CT)	1669
Crystal River(FL)	442
St. Lucie(FL)	1086
Turkey Point(FL)	871
Hatch(GA)	1334
Vogtle(GA)	1462
Arnold(IA)	420
Braidwood(IL)	1494
Byron(IL)	1444
Clinton(IL)	690
Dresden/Morris(IL)	1569
La Salle(IL)	1261
Quad Cities(IL)	1123
Zion(IL)	1028
Wolf Creek(KS)	708
River Bend(LA)	823
Waterford(LA)	675
Pilgrim(MA)	476
Yankee-Rowe(MA)	134
Calvert Cliffs(MD)	1140
Maine Yankee(ME)	356
Big Rock Point(MI)	131
Cook(MI)	1235
Fermi(MI)	764

TABLE 1

Palisades(MI)	454
Monticello(MN)	342
Prairie Island(MN)	805
Callaway(MO)	735
Grand Gulf(MS)	1016
Brunswick(NC)	903
Harris(NC)	921
McGuire(NC)	1464
Cooper(NE)	454
Fort Calhoun(NE)	362
Seabrook(NH)	630
Oyster Creek(NJ)	519
Salem/Hope Creek(NJ)	1992
Fitzpatrick/Nine Mile(NY)	1971
Ginna(NY)	379
Indian Point(NY)	1155
Davis-Besse(OH)	535
Perry(OH)	631
Beaver Valley(PA)	1156
Limerick(PA)	1722
Peach Bottom(PA)	1408
Susquehanna(PA)	1582
Three Mile Island(PA)	435
Catawba(SC)	1,330
Oconee(SC)	1500
Robinson(SC)	306
Summer(SC)	538
DOE-Savannah River(SC)	8131
Sequoyah(TN)	1179
Watts Bar(TN)	840
Comanche Peak(TX)	1558
South Texas(TX)	1448
North Anna(VA)	1079
Surry (VA)	902
Vt Yankee(VT)	484
Kewaunee(WI)	401
LaCrosse(WI)	37
Point Beach(WI)	742
Corridor Subtotal	68792

TABLE 2

YMDEIS TRANSPORTATION IMPACTS		
TRUCK SHIPMENTS THROUGH SOUTHERN CALIFORNIA		
NEVADA CURRENT CAPABILITIES SCENARIO, DOE MODULE 2		
CONSOLIDATED SOUTHERN ROUTING		
CALIFORNIA TOTAL		26375
CORRIDOR I-5/I-10/I-15		1352
Humboldt Bay(CA)	44	
Diablo Canyon(CA)	1308	
Corridor Subtotal	1352	
CORRIDOR I-40/I-15		25023
Browns Ferry(AL)	2067	
Haddam Neck(CT)	255	
Crystal River(FL)	442	
St. Lucie(FL)	1086	
Turkey Point(FL)	871	
Dresden/Morris(IL)	1569	
Pilgrim(MA)	476	
Yankee-Rowe(MA)	134	
Calvert Cliffs(MD)	1140	
Big Rock Point(MI)	131	
Cook(MI)	1235	
Fermi(MI)	764	
Palisades(MI)	454	
Monticello(MN)	342	
Callaway(MO)	735	
Grand Gulf(MS)	1016	
Cooper(NE)	454	
Fort Calhoun(NE)	362	
Oyster Creek(NJ)	519	
Salem/Hope Creek(NJ)	1992	
Fitzpatrick/Nine Mile(NY)	1971	
Ginna(NY)	379	
Indian Point(NY)	1155	
Peach Bottom(PA)	1408	
Oconee(SC)	1500	
Surry (VA)	902	
Vt Yankee(VT)	484	
Kewaunee(WI)	401	
LaCrosse(WI)	37	
Point Beach(WI)	742	
Corridor Subtotal	25023	

TABLE 3

TABLE 3			
YMDEIS TRANSPORTATION IMPACTS			
RAIL SHIPMENTS THROUGH SOUTHERN CALIFORNIA			
NEVADA CURRENT CAPABILITIES SCENARIO,DOE MODULE 2			
CONSOLIDATED SOUTHERN ROUTING			
CALIFORNIA TOTAL			9831
UNION PACIFIC(SP) from Rancho Seco			
Rancho Seco(CA)	21		21
BURLINGTON NORTHERN/SANTA FE from San Onofre			
San Onofre(CA)	207		207
UNION PACIFIC(SP) from Palo Verde via Yuma, AZ			
Palo Verde(CA)	350		350
BURLINGTON NORTHERN/SANTA FE from Kingman, AZ			
			9253
Farley(AL)		157	
Arkansas(AR)		252	
Millstone(CT)		524	
Hatch(GA)		197	
Vogtle(GA)		431	
Arnold(IA)		158	
Braidwood(IL)		215	
Byron(IL)		244	
Clinton(IL)		200	
La Salle(IL)		172	
Quad Cities(IL)		419	
Zion(IL)		250	
Wolf Creek(KS)		106	
River Bend(LA)		101	
Waterford(LA)		91	
Maine Yankee(ME)		60	
Prairie Island(MN)		221	
Brunswick(NC)		321	
Harris(NC)		258	
McGuire(NC)		427	
Seabrook(NH)		83	
Davis-Besse(OH)		71	
Perry(OH)		82	
Beaver Valley(PA)		160	
Limerick(PA)		497	

TABLE 3

Susquehanna(PA)	219
Three Mile Island(PA)	113
Catawba(SC)	253
Robinson(SC)	97
Summer(SC)	82
DOE-Savannah River(SC)	1739
Sequoyah(TN)	161
Watts Bar(TN)	121
Comanche Peak(TX)	246
South Texas(TX)	358
North Anna(VA)	167
Corridor Subtotal	9253