

AULG DEIS Transportation Concerns



Presentation to the Nuclear Waste
Technical Review Board

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Draft EIS Transportation Concerns:

- Cumulative Effects
- Does not consider effects at the local and county level
- Ignores the disposal of LLW at the Nevada Test Site
- Transportation Assessment Concerns
 - National
 - AULG
 - Program-related
 - Emergency Response

Cumulative Impacts

- 40 CFR 1508.7 ...Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.
- DOE is obligated to consider all past, present and reasonably foreseeable actions.
- The approach in the DEIS does not consider the collective impact of all actions.
Does not address the cumulative impacts of other nuclear waste destined for the Nevada Test Site

Transportation Assessment (National Concerns)

- The DEIS does not evaluate a full range of modal alternatives
- DOE assumes a "single-route" strategy for national transportation and does not compare mode alternatives
- The analysis of transportation uncertainty does not include accurate data for the casks, trucks, or rail
- Fails to address the impact of human and institutional factors on uncertainty
- Does not identify the safest mode route combination for the national shipment campaign, cross-country and in the destination state

Transportation Assessment (AULG Concerns)

- Lacks an "Implementing Alternative" to analyze issues such as route, mode, etc. to test the system and determine potential impacts (see Map)
- Inaccurate data used to evaluate risk
- Does not address transportation issues traditionally evaluated in an EIS (e.g., congestion, infrastructure, accidents, weather, natural events)
- Avoids consideration of other "risks" by which the public makes decisions (e.g., economy, property values, etc.)
Does not provide a thorough description of intermodal handling operations

Transportation Assessment (Program Concerns)

- Fails to describe how an "implementing alternative" could be selected
- The DEIS fails to address how human health risk will enter into decision-making
- Avoids discussion of the construction, operation, and maintenance of the transportation system
- Doesn't discuss schedule particularly when transportation system issues will be considered and resolved

Emergency Response Concerns

- "No there, there"
 - Not enough information provided by the DEIS to understand impacts on urban and rural communities
 - No description of the Maximum Reasonably Foreseeable Accident (MRFA)
- No discussion of FEMA's role

Conclusions

- NWTRB should ask DOE to address NRC comments
- DEIS is not an adequate assessment
- DEIS contains poor data, poorly analyzed
- The DEIS is not a comprehensive or thoughtful analysis
- Presents a misleading and incomplete story to Congress and the public