

State of Nevada Transportation Recommendations

- (1) A comprehensive approach to risk assessment, risk management, and risk communication;
- (2) Development of a preferred transportation system;
- (3) Full-scale, physical testing of shipping casks;
- (4) Accident prevention and emergency response;
- (5) Adequate attention to terrorism and sabotage risks.

Recommended NEPA Process

- Step 1 – Draft Transportation Plan
 - Symmetry between national and Nevada components
 - Identification of modes and route alternatives
- Step 2 – Scoping for a Programmatic EIS
 - Draft transportation plan becomes the basis for scoping

- Step 3 – Draft Programmatic EIS
 - Fully integrates national and Nevada programmatic elements
 - Provides structured opportunities for public and stakeholder comments/involvement

- Step 4 – Final Programmatic EIS
 - Identifies preferred system alternatives (mode; routes; at-reactor mode choices; Nevada access mode choices – LWT, HHT, rail; Nevada preferred rail access corridor, if applicable)
- Step 5 – Record of Decision
 - Programmatic Decisions on Modal choices, Route(s), Nevada rail or highway access, etc.

- Step 6 – Tiered EISs for sub-components of the transportation system (HHT operations, rail alignment, intermodal facilities, etc.)

DOE's Caliente FR Notice: Most Recent Example of DOE's Flawed Approach

- Lack of a systems approach to transportation planning;
- Corridor selection and mode selection decisions juxtaposed;
- Corridor selection decisions not supported by detailed comparative analyses;
- No State or stakeholder involvement or consultation;

- Disconnect between national mode/route and Nevada mode/route decisions;
- Illegal NEPA segmentation.