

1 MR. HALL: My name is Jim Hall, and
2 for almost seven years, I served as chairman
3 of the National Transportation Safety Board.
4 Prior to heading the NTSB I served for six
5 years as director of state at the state of
6 Tennessee state planning office, which was
7 charged with overseeing the Department of
8 Energy's cleanup of the Oakridge Nuclear
9 Weapons Complex. Today I'm speaking on behalf
10 of the state of Nevada Agency for Nuclear
11 Projects.

12 [My comments address the
13 transportation aspects of the draft
14 supplemental environmental impact statement.
15 I want to begin by pointing out that the DOE,
16 Department of Energy, still does not have a
17 comprehensive plan for safe transportation of
18 spent nuclear fuel and high-level nuclear
19 waste to the proposed repository at Yucca
20 Mountain. I first came to this issue in May
21 of 2002. This was after DOE issued its final
22 environmental impact statement, and I was

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1 asked to give my opinion on this and related
2 matters before the United States Senate.

3 In my testimony, I noted an
4 important fact. Even though DOE was moving
5 ahead with the Yucca Mountain site selection
6 process, they had yet to put in place a
7 transportation plan. In fact, I was surprised
8 to learn that then-secretary Abraham, in
9 testimony before Congress, said, and I quote,
10 "The DOE is just beginning to formulate its
11 preliminary thoughts about a transportation
12 plan." When I heard this statement, I was
13 shocked. How and why would they decide on a
14 repository if they did not know if they could
15 safely transport this highly radioactive waste
16 to this site.

17 For me, it was a clear case of
18 putting the cart before the horse. Fast
19 forward five years to March of 2007. I was
20 listening to the current DOE waste program
21 director, Ward Sproat, give a presentation to
22 the mostly pro-Yucca Mountain audience here in

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1 Washington. The director said right out that
2 Nevada was correct to criticize DOE for not
3 having a transportation plan, and he pledged
4 to fix that. Sure enough, in July 2007, DOE
5 issued a draft national transportation plan
6 for public review, and even had Sproat's name
7 on the title page.

8 But there was immediate
9 controversy over a table in the plan that said
10 construction of the Nevada railroad project
11 could cost up to \$3.2 billion. Before we
12 could submit our comments, DOE announced that
13 the plan had been withdrawn until further
14 notice. So now, almost seventy months after
15 DOE selected Yucca Mountain, there is still no
16 transportation plan. But there are two new
17 draft EIS's, the documents we are here to
18 comment on today.]

2 [The DSEIS is a large document,
20 over a thousand pages. And at first reading,
21 it appears to say a lot about transportation.

22 But when you analyze it, you find remarkable

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1 absence of meaningful details. This certainly
2 is not a transportation plan, but it does
3 raise a lot of unanswered questions. The
4 DSEIS tells us that DOE is prepared to ship
5 all the projected spent nuclear fuel from US
6 nuclear plants to Yucca Mountain if Congress
7 amends the law.

8 That would require five thousand
9 truck shipments and 24,000 rail casks, and
10 seven to eight thousand trains over fifty
11 years, or two trucks and three trains every
12 week. Considering the average shipment
13 distance would be about two thousand miles, at
14 an average shipment time of two to five days,
15 it becomes quickly apparent that every day for
16 fifty years, there would be one or more DOE
17 shipments to Yucca Mountain on the roads and
18 rails somewhere in America.]

3 19 [The DSEIS tells us that DOE wants
20 to ship most of the spent nuclear fuel by rail
21 in so-called TAD canisters. But the TAD
22 canister system does not exist yet. It's

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1 under development. And we already know that
2 it will not be compatible with most of the
3 current dry storage systems. We know that one
4 third of the reactor sites cannot use TADs
5 without intermodal shipments by barges or
6 monster heavy-haul trucks.

7 We don't know how many, if any,
8 utilities would use the TAD if they were
9 available. And the DSEIS has no contingency
10 plan for how the repository systems would
11 function if the TAD idea does not work. The
12 DSEIS tells us that DOE does not intend to
13 ship the oldest or older fuel first, which the
14 National Academy of Sciences recommended as a
15 way of reducing risk and demonstrating DOE's
16 ability to remove spent fuel from shut down
17 reactor sites.

18 Instead, DOE has designed the TADs
19 to accommodate high burn up fuel that has only
20 been cool five to ten years, inviting the
21 utilities to ship the hottest fuel first,
22 exactly the opposite of a transportation risk

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1 reduction strategy.] [The DSEIS tells us that 4
2 DOE has not selected the routes that will be
3 used for shipments to Yucca Mountain. The DOE
4 has only studied representative routes,
5 despite all the maps and tables that purport
6 to show exactly how many shipments would
7 travel through each state.

8 Confusing? Based on twenty years
9 of routing studies by DOE, Nevada, and others,
10 we know that whenever final routes are
11 selected, the shipments to Yucca Mountain will
12 traverse forty to forty five states, six to
13 seven hundred counties, and forty to fifty
14 American Indian nations. Once those shipments
15 get to Nevada, there is no confusion about
16 impacts on Las Vegas. At least eight percent
17 of the rail shipments and perhaps forty
18 percent or even eighty percent would use the
19 Union Pacific mainland to Caliente through
20 downtown Las Vegas, traveling within one half
21 mile of the world famous Las Vegas Strip.

22 DOE's preferred highway route

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1 would steer all the truck shipments through
2 the northern and western Las Vegas suburbs on
3 the I-215 beltway. Is it any wonder that
4 ninety five percent of Nevadans oppose Yucca
5 Mountain? DOE now says that it will use
6 dedicated trains for rail shipments, after
7 thirty years of saying it was perfectly
8 acceptable to put spent fuel casks in general
9 freight trains with other hazardous materials.

10 And DOE acknowledges that shipping casks are
11 vulnerable to terrorist attacks. And DOE
12 acknowledges that cleaning up after a very
13 severe accident or incident that releases
14 radioactive material could cost up to \$10
15 billion.]

16 We appreciate the opportunity to
17 make these comments, and we'll be providing
18 written comments on the Yucca Mountain SEIS,
19 and are still looking forward to reviewing the
20 DOE national transportation plan.

21 MR. BROWN: Thank you. Daniel
22 Deakhouse? To be followed by Brian O'Connell,

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