

RRR000995



Charles Alley <chuckalley@yahoo.com> on 01/10/2008 09:45:41 AM

To: eis\_office@ymp.gov  
cc: chuckalley@yahoo.com  
Subject: Submission of Comments/Publications

LSN: Relevant - Not Privileged  
User Filed as: Excl/AdminMgmt-14-4/QA:N/A

1. Attached please find two (2) letters concerning comments/questions which I have in reference to the Yucca Mountain Repository.
2. In addition, I am requesting additional publications which I need so I can continue my review and understand more about the Yucca Mountain Repository.
3. The reason for the request of these publications is that at the current time I do not have a workable printer.
4. Thank you in advance for your assistance.

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1 [ 1. I have been reviewing the Draft Supplemental EIS for a Geological Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (DOE/EIS-0250F-S1D) (**Repository SEIS**) along with the Draft Supplemental EWIS for a Geological Repository Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada – Nevada Rail Transportation Corridor and Draft EIS for a Rail Alignment for the Construction and Operation of a Railroad in Nevada to a Geological Repository at Yucca Mountain, Nye County, Nevada (DOE/EIS-0250F-S2D and DOE/EIS-0369D) (**Draft Nevada Rail Corridor SEIS and Draft Rail Alignment EIS**).

2. At the offset I believe that the public should have FULL access to any and all publications prepared relating to the Yucca Mountain Repository. As such, I believe that whenever the public requests any publications which are on the OCRWN website they should be provided such so the public can obtain additional information.

(a) Throughout the FEIS (DOE/EIS-0250F), **Repository SEIS** (DOE/EIS-0250F-S1D), **Draft Nevada Rail Corridor SEIS** and **Draft Rail Alignment EIS** (DOE/EIS-0250F0S2D and DOE/EIS-0369D), DOE states that if the public wants additional information see (name of publication) for additional information. Therefore, if DOE is telling the public to go to this or that publication for additional information, such publication should be made available to the public and provided if requested.

(b) I haven't been able to get this accomplished. I have submitted numerous emails requesting a hard copy of numerous publications for my use in obtaining additional information and they haven't been provided to me to assist me in reviewing the Yucca Mountain Repository. ]

2 [ 3. Throughout my reviewing of FEIS (DOE/EIS-0250F), **Repository SEIS** (DOE/EIS-0250F-S1D), **Draft Nevada Rail Corridor SEIS** and **Draft Rail Alignment EIS** (DOE/EIS-0250F0S2D and DOE/EIS-0369D), DOE has used wording like "could", "might" and "undecided" in reference to the Yucca Mountain Repository and all its structures, subsurface layout and rail alignments associated with the construction and operational phases of the Yucca Mountain Repository.

(a) One aspect is that DOE states that the final design hasn't been decided. I believe that with DOE going to submit documentation for a construction permit in the LA phase, such designs for all buildings need to be "final". Therefore, has a final decision been made on ALL the building associated with the Yucca Mountain Repository? In addition, has a final decision been made on the location of such buildings? Will the public be provided with this final decision associated with ALL the buildings, etc.?

(b) Has all required testing and studies been completed? If not, when will such testing and studies be completed? Will such testing and studies be

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made available to the public for their review and have the opportunity to submit comments and/or questions on such?

4. This is the second letter which I am providing reference to questions and/or comments which I have concerning the Yucca Mountain Repository. ]

3[ (a) **Mina Rail Corridor** – Throughout the Rail Corridor EIS, DOE has provided a full array of information reference to such corridor including various options and alternatives within this corridor. However, by the action of the Walker River Paiute Tribal Council in May 2007 by the withdrawal of its support in its participation and with its renewed past objection to the transportation of nuclear waste through its reservation, it causes the death of this proposed corridor. Thereby there is only one corridor being presented to be used for the transport of nuclear waste in Nevada – the Caliente Rail Corridor.

(1) Why present the Mina Corridor as an alternate to the Caliente Corridor when it was considered as being nonpreferred in the first place?

(2) Therefore, by not proposing another rail corridor (besides the Caliente Rail Corridor) in the State of Nevada as a viable alternate, doesn't that violate the intent and at least the spirit of the law? ]

4[ (b) **Caliente Rail Corridor** – DOE has provided extensive information on this corridor along with numerous alternatives to such. By the action of presenting only the Mina Rail Corridor (and after designating it as being nonpreferred) along with the elimination of any other corridor – this has caused the Caliente Rail Corridor to become the only rail corridor to be used in the transport of nuclear materials throughout the State of Nevada.

(1) Why hasn't DOE provided another **preferred** rail corridor which could be acceptable to DOE besides **only** this corridor – the **Caliente Rail Corridor**? ]

5[(2) It has been stated that the construction of the rail corridor in Nevada would take 4-10 years for completion. Yet when you analyzed the groundwater resources, you used a 4-year construction period which resulted with 150 to 176 new wells needed to be constructed.

a) There is conflicting data presenting on the actual construction period for this rail corridor. What is the anticipated construction period for this rail corridor in Nevada?

b) If it takes longer than 4 years for this construction period will additional wells need to be installed besides these 150 to 176 anticipated right now supplying the required water supply?

(3) On p. 4-37, Table 4-11, it states that for construction wells – a maximum of 107 wells would be required under the Proposed Action. I thought that the number of wells required would range from 150-175 wells. Could you clear up this contradiction up? ]

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cont.

5. Although the following questions might be outside the provisions of the **Repository SEIS** and the **Draft Nevada Rail Corridor SEIS** and **Draft Rail Alignment EIS** to the Yucca Mountain, they are relevant since they pertain to the License Application procedures.

(a) **Retrieval Plan:** IAW NUREG-1804, Yucca Mountain Review Plan, DOE is to provide a detailed plan on its retrieval of the spent nuclear materials and high-level radioactive waste from the repository. It states that DOE shall describe "plans for the retrieval and the alternative storage of, waste packages from emplacement drifts..."

(1) Has this detailed retrieval plan been prepared using the detailed technical review as stated in Section 2.1.2 of the Yucca Mountain Review Plan?

(2) I believe that DOE needs to provide further and more detailed information reference to the proposed retrieval plan than what currently is provided. DOE states that retrieval "could" and "might" be done this or that way. DOE needs to nail the retrieval procedures down completely!

(b) **Emergency Plan:** DOE is to provide a detailed plan on the various types of emergencies which could occur throughout the operational aspect of the repository. What is the present status of such emergency plan covering these various types of emergencies?

(c) **Stakeholder interactions:** It stated that all stakeholders would be involved in the planning for route identification, funding approaches for emergency response planning and training, understanding safeguards and security requirements, operational practices, communications, and information access. Therefore, to accommodate these requirements, it is stated that Doe is to prepare a comprehensive national spent fuel transportation plan.

(1) What is the status of this comprehensive national spent fuel transportation plan?

- (2) When will it be made available for public review and comment to such transportation plan?

(d) **Inspection Plan:** It states that DOE would develop an inspection plan that would outline the procedures that would be used to inspect the track, rail roadbed, bridges, and other structures along the rail line.

- (1) What is the status of this inspection plan?
- (2) Is it going to be developed for submission to the general public for their review and comment?

(e) **Environmental Management System and Pollution Prevention/Waste Minimization Program:**

- (1) Since these two (2) programs are to be implemented during the construction and operations phase, what is the status of these two (2) programs?
- (2) Will these two (2) plans be provided for public review and have the opportunity to provide comments to such?

## 6. Miscellaneous Provisions

(a) It has been stated in the **Rail Alignment DEIS (DOE/EIS-0369D)** that DOE is currently preparing an application for the construction authorization.

- (1) How can DOE be currently preparing for the License Application (LA) for the construction authorization when detailed information on the infrastructures and other related items are still being reviewed with no final design decision having been made?
- (2) Furthermore, how can DOE currently be preparing an application for the construction authorization when no final decision of the **Rail Corridor** not having been made since no **FINAL** Repository along with the Nevada Rail Corridor and Rail Alignment has been finalized and produced? ]

6 [ (b) **Draft EIS on Disposal of Greater-Than-Class-C Low-Level Radioactive Waste (DOE/EIS-0375):** DOE is preparing this EIS to address various methods for the disposal of wastes with concentrations greater than Class C.

- (1) One of the options being considered is for the disposal of such material in a deep repository. What effects would this
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have for Module 2 (categorized in the FEIS to consist of Greater-Than-Class-C Low-Level Radioactive Waste) to be stored at the repository? ]

7 [(2) Does DOE plan on requesting authorization from Congress to allow for more than 70,000 metric tons of heavy metals of spent nuclear fuel and high-level radioactive waste to accommodate Module 2? ]

8 [(c) Relationship Between Short-Term Uses and Long-Term Productivity: It states in the **Draft Rail Corridor** (DOE/EIS-0369D) that DOE "might eventually abandoned the proposed railroad and its operations support facilities, although it is unlikely that the rail roadbed would ever be completely dismantled".

- (1) Upon the completion of the movement of the spent nuclear fuel and high-level radioactive waste to the repository by this proposed Caliente rail corridor and the Shared-Use Option has not been approved, will the rail line and associated operations support facilities be dismantled and removed or just kept in place?
- (2) If the Shared-Used Option is approved, would the commercial carriers pay DOE or the State of Nevada or both some type of fee for the use of such rail line?
- (3) If the rail line and associated operations support facilities are abandoned, dismantled and removed, what would the procedures be for such action?
- (4) Upon the completion of the dismantling and removal, would DOE initiate restoration procedures?

(d) **Debris Flow:**

- (1) What procedures is DOE preparing and will implement to curtail debris flow along the rail alignment during both the construction and operational phase?
  - (2) Would the shipping be stopped until railway is cleared of any debris or would the truck scenario be instituted until the railway is cleared? ]
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(e) **Quarries:**

- 9 [ (1) Upon the completion of the construction phase, would be buildings be demolished?
- (2) Would the quarries be filled in? If so, where would this material be brought from for this fill-in of these quarries? Mode of transportation for this material to the quarries?
- (3) What would the status of these substations be upon the completion of the constructional phase of this project? Would these substations be demolitions, etc.?
- (4) It states that DOE might build a substation connected to the existing transmission lines to supply this need at Caliente, but this is conceptual at this stage of the design. Has DOE made a final decision on whether they plan on building this substation? ]

10 [ (f) **Advance Notification:** IAW DOE Manual 460.2-1, *Radioactive Material Transportation Practices*, it required written notification reference to the movement of spent nuclear fuel and high-level radioactive waste shipments. However, the current regulations do not require any type of notification to tribal authorities.

- (1) Are current regulations being modified to inform tribal authorities of movement of spent nuclear fuel and high-level radioactive waste shipments through their jurisdiction? ]

11 [ (2) In reference to other types of movement (construction materials, etc.) would the State of Nevada along with the tribal authorities also be notified along? ]

12 [ (g) **Railroad Safety Program:** The Rail Safety Act of 1970 authorizes states to work with the Federal Railroad Administration to enforce federal railroad safety regulations. However, it states that the states must enter into an agreement with the FRA for this authorization.

- (1) Have the states, effected by the movement of spent nuclear fuel and high-level radioactive wastes through their territory, been notified and agreements done with the FRA for their right to conduct inspections? ]

13 [ (2) Has a final decision been made on the rail routes throughout the nation and the states effected by this movement? ]

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14 (h) **Shipping Containers:** Pursuant to NWPA, the designs of the shipping casks for transportation of the spent nuclear fuel and high-level radioactive waste would be NRC certified. As stated in the **Draft Rail Corridor** (DOE/EIS-0369D) DOE has a preference for maximizing the use of existing cast designs rather than developing new ones.

- (1) Existing cask designs would have to be modified to accommodate TAD canisters before NRC would certify such. What types of modification would be required from these existing cast designs so that this certification could be accomplished?
- (2) What is the cost associated with modifications of existing cast designs with the development of new ones? ]

15 (i) **Cask Maintenance Facility:**

- (1) Has a final decision been made on where such Cask Maintenance Facility is to be located? ]
- 16 (2) It has been stated that the Cask Maintenance Facility would periodically remove casks from service and perform maintenance and inspection. What is considered **periodically**?
- (3) How shall it be determined which casks are to be removed and this inspection and maintenance is to be conducted? Wouldn't these casks be inspection after *each* shipment has been delivered to the Yucca Mountain Repository? ]

15 cont (j) **Staging Yard:**

- (1) Has a final decision been made on where such Staging Yard is to be located? ]
- 8 cont (2) Upon the completion of the movement, would the Staging Yard be demolished and the areas reclaimed with the post-construction and maintenance best management practices? ]

13 cont (k) **Transport Services:** IAW ROD, DOE selected the mostly rail scenario for the nationwide and throughout the State of Nevada for the transport of the spent nuclear fuel and high-level radioactive waste.

- (1) Has a final decision been made reference to the actual rail roads throughout the various states affected by this decision? If not, when?
-



(2) Upon arriving at this decision, will additional studies, Environmental Assessment or even EIS be conducted to determine the human health and/or environmental aspect for the transport of such throughout these various states?

(3) When will the public be informed and would they have the opportunity to submit comments reference to this decision? ]

17 [ (4) From those original sites which do not have rail capabilities, would either the mostly truck or barge scenario be used? What effects on the human safety and the environment would using the mostly truck or barge scenario be? What about the security and safety aspects of such scenario (whichever one would be used)?

(5) I thought that DOE would use the TAD canisters to transport the spent nuclear fuel and high-level radioactive waste. However, DOE stated that "at some sites with limited cask handling capability, DOE would use overweight trucks for smaller casks". Aren't all these casks going to be approved and tested TAD canisters for the movement? ]

[ (k) **Operations Impact:** It states that the crossties, ballast, rails, and bridges would not likely to require replacement before 2033. Since the shipment is to go beyond the year 2033:

(1) What procedures would be implemented in the replacement of such, if required? Where would be materials be obtained from? Would quarries be reopened to obtain the required material? Mode of transportation and construction camps needed for the replacement of such?

(2) Would effect would this have on the shipment? Would such shipment be stopped until the completion of this work or another method of transport be instituted? ]

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cont [ (l)

**Planning and Mobilization:**

(1) What is the status of the Transportation Operations Plan? When will such plan be made available to the public for their review and have the opportunity to submit comments?

(2) Since DOE already know the individual sites whereby they will be shipping spent nuclear fuel and high-level radioactive waste from along with the quantities, is DOE preparing these

individual site plans for these individual sites. If so, when will they be available to the public? ]

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[ (m) **Electricity:** It states that the power to the distribution system would be fed from locations where the rail line would intersect existing high-voltage transmission lines. At this stage of the design process, DOE has not identified specific locations. As DOE made a determination where these specific locations are to be located, and if so, where?

(n) **Potential Sources of Construction Materials:** Has a final determination been made on subballast suitability been made (if DOE decides to implement the Proposed Action along with Caliente rail alignment)? ]

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[ (o) **Vegetation:** It states that "crusts are highly sensitive to surface disturbance and are easily destroyed. Biological crusts are potentially present in areas where construction would occur, but ...*insufficient data regarding the location and extent of biological crusts in the region of influence exists*". Is DOE going to conduct further studies to identify any biological crusts in the construction area? ]

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cont

[ (p) **Tracking and Communication:**

- (1) What is the status of this detailed backup procedures to ensure safe operations in the event that the tracking system is temporarily unavailable?
- (2) What type of communication is/will be available for communication procedures for nationwide in reference to the shipment procedures?

(q) **Transportation Operational Contingencies:** It states that if weather conditions are unacceptable, DOE could delay the shipment until travel conditions became acceptable or reroute the shipment.

- (1) If already deployed, what would the status of the trains – locations where they are to be held, security arrangements, safety procedures, etc., if the weather conditions warrant the suspension of shipment along with rail line, either in the State of Nevada or outside Nevada?
- (2) Has DOE designated location(s) of "safe" stopping areas of the trains, with security, safety, etc. being put in place? If so, location of such "safe" stopping areas and the type of security, safety arrangements being planned for such "safe" stopping areas? ]

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7. The following publications are requested so I may continue my review of the Yucca Mountain Repository with all aspects of it:

(a) Transportation, Aging and Disposal Canister System Performance Specification Revision 0 (DOE/RW-0585);

(b) Transportation, Aging and Disposal Canister System Performance Specification Revision B (DOE/RW-0585);

(c) Waste Acceptance System Requirements Document Revision 5 (DOE/RW-0351);

(d) Comments on DOE/RW-0585- Preliminary Transportation, Aging, and Disposal Canister System Performance Specification (Rev A);

(e) Evaluation of Technical Impact on the Yucca Mountain Project Technical Basis Resulting From Issues Raised By E-mails of Former Project Participants; and

(f) Yucca Mountain Science and Engineering Report ]

1. Upon extensively reviewing the *Viability Assessment of a Repository at Yucca Mountain* (DOE/RW-0508), the *Final Environmental Impact Statement for a Geological Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada* (DOE/EIS-0250F) and the *Draft Supplemental Environmental Impact Statement for a Geological Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada* (DOE/EIS-0250F-S1D), I have arrived at the following questions and/or comments reference to the proposed Yucca Mountain Repository. (Note: Upon finishing my review of the *Draft EIS for a Rail Alignment for the Construction and Operation of a Railroad in Nevada to a Geological Repository at Yucca Mountain, Nye County, Nevada* (DOE/EIS-0369D) I shall be preparing another series of questions and comments pertaining to such.)

A. **Administrative Aspects:**

19 [ 1. Has the final design for the overall repository been completed? If not, what is the expected date of this completion? Will DOE be issued a report detailing this detailed design and made available to the public?

2. Since the Repository Milestone depicted in page 1-2 of Volume 1 of the *Viability Assessment of a Repository at Yucca Mountain (VA)* hasn't been met, is a revised and realistic Repository Milestone be published in the *Final Supplemental EIS*. ]

1 cont. [ 3. Upon reading the comments received reference to the *Final EIS* (DOE/EIS-0350F), numerous responses to these comments referred to other documents and/or reports which have been conducted. Examples of such responses are below:

- \* Treatment of water from the fuel pools is discussed in the **Science and Engineering Report (DIRS 153849-DOE 2001)**;
- \* Further information on blending strategy and proposed facilities can be found in the *Science and Engineering Report*;
- \* For details of the higher-temperature repository operating mode ventilation estimates, see FEIS **Update to Engineering File – Subsurface Repository (DIR 150941-CRWMS M&O 2000)**.

With DOE referring to these and other reports for the public to receive additional information, wouldn't it be prudent to make available these and whatever other documents and reports the public might need to fully understand both the concept and operation of this repository? ]

2 cont. [ 4. In the Licensing Application (LA) process, will be public be involved? Will the public be authorized to the numerous publications and reports submitted in this LA process? If so, how will these publications and reports be submitted to the

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public? I believe that if the public has full access to those publications and reports, they will be able to better understand the conceptual and other aspects pertaining to the Yucca Mountain Repository. ]

20 [ B. **International Atomic Energy Agency:**

The United States is a signature member of the International Atomic Energy Agency (IAEA). As such, there are certain requirements which the United States must do in its obligation to such. Therefore, the following questions pertain to the IAEA.

1. Throughout this whole process pertaining to the Yucca Mountain Repository, from the initial concept to the final aspect of it, has the United States been in consultation with the IAEA. If so, what are the results of this consultation?

2. Throughout the construction aspect will the United States allow the IAEA to conduct inspection of the Yucca Mountain Repository to ensure compliance with its obligations to the IAEA?

3. In reference to the requirements by the IAEA is the United States planning or going to comply with the provisions of (partial listing):

(a) IAEA-TECDOC-1398 – Records for radioactive waste management up to repository closure: Managing the primary level information (PLL) set;

(b) IAEA-TECDOC-1208 – Monitoring of geological repositories for high level radioactive waste;

(c) IAEA-TECDOC-1515 – Development of Specifications for Radioactive Waste Packages;

(d) IAEA-TECDOC-1192 – Multi-purpose container technologies for spent fuel management.

4. IAW with INFCIRC/288, entitled, "Agreement Between the United States of America and the International Atomic Energy Agency for the Application of Safeguards in the United States", "the United States shall establish a system of accounting for and control of all nuclear material...". Therefore, shall the United States abide by the provisions of paragraphs 51 to 69, inclusively? ]

C. **Transportation, Aging, and Disposal (TAD) Canisters:**

21 [ 1. In the *Final EIS* (DOE/EIS-0250F), a 90% scenario was proposed for the placement of commercial nuclear fuel into TAD canisters. Due to comments from the public, a 75% scenario was presented in the *Draft Supplemental EIS*

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(DOE/EIS-0250F-S1D). Why not analysis and propose a 100% scenario using TAD canisters?

Since, at the commercial site, it is currently being proposed to place either 90% or 75% (whichever method is approved) of the commercial nuclear spent fuel in the TAD canisters in the first place prior to shipment, **and** that eventually all the commercial nuclear spent fuel is to be placed in the TAD canisters (either at the commercial site or at the repository), wouldn't it seem logical to place all of the commercial nuclear fuel designated for disposal at Yucca Mountain to be placed in the TAD canisters in the first place, "thereby simplifying and reducing the number of handling operations... at the repository" and "thereby eliminating the need to ever open the canister and handling that spent nuclear fuel at the repository".

2. IAW *Storage and Disposition of Weapons-Usable Fissile Materials Final Programmatic Environmental Impact Statement (DOE/EIS-0229)* DOE is using 6M Type B canister for shipment of their plutonium (other than pits) or highly-enriched uranium.

What is the difference between the TAD canisters and the 6M Type B canister? Upon arriving at the repository, would the 6M Type B canister be treated like a TAD canister whereby it would be placed directly in a disposal container? If not, what then would be procedures be reference to this 6M Type B canister? ]

22 [D. **Phased Construction:**

I was under the assumption that all the construction aspect pertaining to the repository would be completed *PRIOR* to the introduction of **ANY** commercial and DOE spent nuclear fuel and high-level radioactive waste. However, according to the *Draft SEIS (DOE/EIS-0250F-S1D)*, such construction would be conducted in a phased-in scenario. According to this scenario, the construction of the buildings and other systems (both the subsurface systems along with the surface systems) would be based on the availability of funds.

1. Wouldn't the full construction funding be appropriated **PRIOR** to the initiation of the construction phase for the repository?

2. Reviewing Volume 5 of the *Viability Assessment of a Repository at Yucca Mountain*, are those figures for the cost (from the conceptual to the closure of the repository) still accurate even through the time-line hasn't been met? Would a revised volume or other form of publication be prepared and provided reflecting the accurate time-frame for this Yucca Mountain Project along with the revised cost of us?

3. As the funds where either appropriately in the past or in the future, would a special account be established (or something similar to it) whereby any funds

appropriated would be placed in so that these funds would only be used for this Yucca Mountain Repository?

4. What is the Waste Nuclear Fund? According to figures from the Michigan Public Service Commission released, as of the end of June 30, 2007, there is a total of \$28,287.2 million dollars currently in this Nuclear Waste Fund.

1. What is the Waste Nuclear Fund?
2. Who has control over such fund?
3. What is the purpose of this program?
4. With the funds already collected and also being collected in the future, along with funds appropriated by the Congress, wouldn't this fund be used for the Yucca Mountain Repository? ]

13 cont  
[ E **Transportation Aspect:**

Upon reading the provisions of Appendix M, pertaining to "Transportation" and with over 680 pages of comments and responses provided in the *Final EIS* (DOE/EIS-0250F) along with the provisions of Chapter 6 and Appendix G and H of the *Draft SEIS* (DOE/EIS-0250-S1D) all pertaining to the transportation aspect, the public has great concerns about the transporting of the spent nuclear fuel and high-level radioactive materials from the original source to the Yucca Mountain Repository. You stated throughout the responses which were provided to these comments the final shipping routes designated nationwide would be identified at least 4 years prior to the start of the shipment to the Yucca Mountain Repository. These comments and/or questions pertain to both the *FEIS* (DOE/EIS-0250F) and the *Draft SEIS* (DOE/EIS-0250F-S1D).

1. Would an EIS or some other form of documentation be issued when these shipping routes have been identified and would such be provided to the public for their review?

2. You stated that the final routes "would be selected following the requirements and protocols outlined in the Draft Request for Proposal for Regional Servicing Contractors".

(a) When will these routes be finalized?

(b) If needed so will reports or EIS have to be conducted on the selection of some of these final routes?

(c) Although certain aspects of these routes will not be made available to the public due to security concerns, will the public know these final routes? ]

23 [ Reference to Figures A-1 and A-2 of Appendix A, pertaining to the rail and truck transportation routes if DOE selected the Caliente rail corridor in Nevada and G-1 and G-2 of Appendix G, pertaining to the rail and truck transportation routes if DOE selected the Mina rail corridor in Nevada, as depicted in the *Draft SEIS* (DOE/EIS-0250-S1D), these maps do not match with each other.] [Throughout the whole transportation provisions, there is no mention that additional rail lines would be build nationwide. However, by comparing the nationwide maps provided pertaining to both the Caliente and Mina corridor, listed below are the discrepancies:

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1. Reference to the Caliente rail corridor (Figures A-1 and G-1):
  - (a) Is an addition rail line being proposed from Fort Calhoun, IA to Denver, CO? (See Figures A-1 and G-1)
  - (b) Is an additional rail line being proposed from MO going west and north of Wolf Creek, KS to Denver, CO? (See Figures A-1 and G-1)
2. Reference to the Mina rail corridor (Figures A-2 and G-2):
  - (a) Is an additional rail line being proposed from MO going west north of Wolf Creek, KS to Denver, CO? (See Figures A-2 and G-2)
  - (b) Is an additional rail line being proposed from Comanche Peak, TX, going north, then through NM and AZ connecting to the CA rail line? (See Figures A-2, G-2 and G-40)?
  - (c) Are two (2) additional rail lines being proposed to run south at OR and connect to the rail line in CA? (See Figures A-2, G-2 and G-35)
  - (d) Is an additional rail line being proposed north from San Onofre, CA to connect to the main rail line in CA? (See Figures A-2 and A-1)
  - (e) Is the main rail line in CA proposed to be extended so it run to the southern tip of Nevada connecting CA? (See Figure A-2) ]

F. **Spent Nuclear Fuel and High-Level Radioactive Waste:**

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[ A response to a comment stated that "spent nuclear fuel from other facilities (for example civilian research reactors) could be shipped directly to the repository".

1. How would the spent nuclear fuel falling under this category be shipped to the repository, by rail or by truck?



2. Prior to shipment, how would such spent nuclear fuel be prepared for this shipment, type of canister, etc.?

26 [ A comment asked the following: "Will the plutonium at the Pantex Plant, Rocky Flats Environmental Technology Site, Los Alamos and Lawrence Livermore National Laboratories be treated by this proposed action? If so, why are these not included in the maps, transportation routes, and analysis"? The response stated that they would be processed and shipped from the Savannah River Site to the repository.

1. Why are you shipping this spent nuclear fuel from those locations mentioned above to the Savannah River Site and then to the Yucca Mountain Repository?

2. If such nuclear spent fuel needs to be converted into either mixed-oxide fuel (MOX) or into immobilized plutonium, wouldn't it seem logical to have such spent nuclear fuel be processed at one of those locations mentioned above instead of shipping it across country to the Savannah River Site for conversion and then placed into disposable containers prior to then being shipped to the Yucca Mountain Repository?

3. Why not have the spent nuclear fuel from those locations mentioned above be shipped straight to the Yucca Mountain Repository?

With them being shipped straight to the Yucca Mountain Repository, there would be a greater chance of not having an accident by having it shipped across country to the Savannah River Site and then to the Yucca Mountain Repository.]

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cont. [ G. **Miscellaneous Provisions:**

In order to be able to review the Yucca Mountain Repository effectively with as much information as I could obtain, request the following publications:

(1) Federal Railroad Administration's (FRA) *Safety Compliance Oversight Plan for Rail Transportation of High-Level Radioactive Waste and Spent Nuclear Fuel*

(2) FINAL ENVIRONMENTAL IMPACT STATEMENT Management of Commercially Generated Radioactive Waste (DOE/EIS-0046F) all

(3) Preliminary Transportation, Aging and Disposal Canister System Performance Specification Revision B (DOE/RW-0585)

(4) Transportation, Aging and Disposal Canister System Performance Specification Revision 0 (DOE/RW-0585)

(5) Waste Acceptance System Requirements Document Revision 5  
(DOE/RW-0351)

(6) Yucca Mountain Science and Engineering Report Rev 1 (DOE/RW-  
0539-1)

(7) Civilian Radioactive Waste Management System Requirements  
Document (CRD) Rev 7 (DOE/RW-0406)

2. As stated above, those questions listed above pertaining to the *Final* EIS (DOE/EIS-0250F). I am anticipating that upon the completion of my review of the *Draft* SEIS (DOE/EIS-0250F-S2D) and the *Draft EIS for the Rail Alignment* (DOE/EIS-0369D) I might have additional questions and/or comments.

3. Request that those publications listed in Section G above be provided as soon as possible so I may continue in this review process.

4. Thank you in advance for your assistance. ]