

REMARKS OF RENNIE HOLLAND
ON BEHALF OF
THE COUNTY OF INYO, CALIFORNIA
FOR THE
U.S. DEPARTMENT OF ENERGY
SCOPING MEETING
ON THE EXPANDED SCOPE OF
THE ENVIRONMENTAL IMPACT STATEMENT
FOR THE ALIGNMENT, CONSTRUCTION, AND OPERATION OF
A RAIL LINE TO A GEOLOGIC REPOSITORY AT
YUCCA MOUNTAIN, NYE COUNTY, NEVADA,
AND
THE SUPPLEMENT TO THE
FINAL ENVIRONMENTAL IMPACT STATEMENT FOR A
GEOLOGIC REPOSITORY AT
YUCCA MOUNTAIN, NYE COUNTY, NEVADA
AMARGOSA VALLEY, NEVADA
NOVEMBER 1, 2006

My name is Rennie Holland and I am the project analyst for Inyo County's Yucca Mountain Nuclear Waste repository oversight program. Inyo County is one of ten "Affected Units of Local Government" (AULG) identified by the Nuclear Waste Policy Amendments Act of 1987 as a local government that is especially affected by the proposed repository at Yucca Mountain. Inyo County is the only AULG member in California. Inyo County also had to file a lawsuit in Federal court to become an AULG. Among the reasons the Federal Court agreed to grant Inyo County affected status was the potential impacts to Inyo County's groundwater due to the Yucca Mountain Project.

The first aspect is a process issue as it relates to the Supplement to the Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, NV. (DOE/EIS-0250F-S1). 71FR198, Friday, October 13, 2006, 60490-60494. This Supplemental notice is a substantial change in the design aspect of the repository. The implications of the Transportation, Aging, and Disposal (TAD) cask are substantial and may create significant impacts on Inyo County. Because of the significant extent of the aquifer system surrounding Yucca Mountain, the integrity of the TAD system may have significant effects on repository performance. Therefore Inyo County requests that the scoping meetings should be held that will allow stakeholders to address issues of TAD performance. There is still substantial uncertainty about the design and extent of the proposed surface facilities at Yucca Mountain. The addition of the TAD concept has increased that uncertainty. Furthermore, we request that a meeting be held in South Inyo County near the end of the comment period to enable residents there, who are concerned about this project to provide their information.

An additional process question concerns the absence of an adequate graphical representation of the route. The textual description in the NOI leaves significant doubt as

to the specific action intended by the DOE. A detailed map that shows the specific extent of the proposed corridor is important in understanding implications for Inyo County.

Other concerns relate to the substance of the NOI. First is that in the nearly five years since the release of the FEIS, DOE has still not developed a comprehensive plan for the safe transportation of spent nuclear fuel and high-level nuclear waste to the proposed repository at Yucca Mountain. Specifically, the DOE has not laid out a plan for shipping these materials which addresses the mix of shipping modes and routes. While Inyo County will not be affected by the rail transportation of these shipments, it may be significantly affected by the truck shipment of waste to Yucca Mountain.

A careful reading of the NOI suggests that the DOE is still examining the feasibility of rail shipment to Yucca Mountain. Despite the DOE's expressed preferences ~~for~~^{for} rail shipment, this may not be possible. The DOE should explicitly address the likelihood of unacceptable delay in the construction of the rail line. Additionally, the DOE is apparently considering the feasibility of transporting nuclear waste to the repository using a variety of intermodal arrangements, including casks designed for legal-weight trucks shipped by rail, and shipment of large rail casks on heavy-haul trucks. All of these alternatives should be specifically addressed and evaluated as alternatives to the proposed action of rail corridor construction.

The DOE must also address how truck shipments will arrive at Yucca Mountain. The FEIS estimated that 10% percent of reactors could not ship by rail. Other estimates are that one third of reactors that do not currently have rail access. It is likely that these shipments will travel by legal weight truck to Yucca Mountain and will contribute to the cumulative effect of the project in the region surrounding Yucca Mountain. There are few alternative routes to Yucca Mountain for truck shipments. The number of truck shipments is important in establishing the context in which rail impacts will occur.

Currently the DOE cannot answer some basic questions about this complex and difficult transportation effort. The results of the scoping meeting should add to the public's knowledge about how waste will be transported to Yucca Mt.