

White Pine County Nuclear Waste Project Office

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January 2, 2008

United States Department of Energy
 Office of Civilian Radioactive Waste Management
 1551 Hillshire Drive M/S 010
 Las Vegas, NV 89134
 Attn: Dr. Jane Summerson

RE: *White Pine County, Nevada Comments to Draft Supplemental Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (DOE/EIS-0250F-S1D) (Repository DSEIS); Draft Supplemental Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High Level Nuclear Waste at Yucca Mountain, Nye County, Nevada—Nevada Rail Transportation Corridor, (DOE/EIS-0250F-S2D) (Rail Corridor DSEIS); and Draft Environmental Impact Statement for a Rail Alignment for the Construction and Operation of a Railroad in Nevada to a Geologic Repository at Yucca Mountain, Nye County, Nevada (DOE/EIS-0369D) (Rail Alignment DEIS).*

Dear Dr. Summerson:

White Pine County (County) has prepared these comments pursuant to the National Environmental Policy Act (NEPA) on the Repository DSEIS, Rail Corridor DSEIS, and Rail Alignment DEIS, all of which were released for public comment by the Department of Energy (DOE) as announced in the October 12, 2007 Notice of Availability published in the Federal Register.

- 1 At the outset, it is important to note that DOE's release of three connected but separate NEPA documents at the same time is viewed by White Pine County as an attempt to encourage the Nuclear Regulatory Commission (NRC) to inappropriately limit the scope of NEPA considerations during the Yucca Mountain license proceedings by discouraging consideration of transportation related matters. White Pine County believes that all three NEPA documents address one Proposed Action, that being development and operation of the Yucca Mountain repository system, including transportation. As such, the County is of the opinion that the three NEPA documents released for public review on October 12, 2007 should in fact have been incorporated into a single document. Notwithstanding this concern, the County is of the belief that each of the three NEPA documents must be submitted by DOE to NRC as a component of the Yucca Mountain license application and that NRC must adopt, to the extent practicable, each of the three NEPA documents. Accordingly, the statement of Purpose and Need contained in each of the NEPA

documents must include the following, "DOE has prepared this (include the title and ascension number for each of the three NEPA documents) to assist the U.S. Nuclear Regulatory Commission (NRC) in adopting, to the maximum extent practicable, any environmental impact statement (EIS) prepared pursuant to Section 114(f) of the *Nuclear Waste Policy Act*, as amended (NWPA, 42 U.S.C. 10101 et seq.)."]

2. [There can be substantial impacts on White Pine County, its residents, society and local economy resulting from the Yucca Mountain repository system if constructed and made operational. A primary concern is centered on extensive and long-term transportation of spent nuclear fuel and other high-level waste by legal and overweight truck through the County on US 93/93Alt./6. Under DOE mostly rail modal preference, as many as 2,700 shipments of high level waste could move through White Pine County over a 50-year period as a result of the Yucca Mountain repository system. Should direct rail to Yucca Mountain not be available, the number of legal and overweight truck shipments through White Pine County could exceed 90,000.

DOE did not include analysis of the US 93/93Alt./6 highway route as an analyzed alternative in the Repository SDEIS. Should this route be selected for use, there would likely be quantifiable impacts to White Pine County resulting from Yucca Mountain destined high level waste transportation. Because it is possible, if not likely, that the Governor of Nevada will designate U.S. 93/93Alt./6 through White Pine County as Nevada's preferred route for spent nuclear fuel shipments (as the state has done for LLW shipments), the County would be impacted.

A study commissioned by White Pine County to assess the radiological risk to residents in the event of a severe accident which results in the breach of a containment cask finds the risk substantially greater than the risks outlined in DOE's DEIS (Radioactive Waste Management Associates, 2001). This analysis assumed an accident at the base of Murry Summit on U.S. 6 (.6 mile from the populated area of Ely), where the road conditions are steep enough to generate a severe accident. The analysis further accounted for location specific conditions to estimate exposure risk to the population and the community water system. This included, evacuation procedures and routes and local meteorological conditions for plume dispersion of the radioactivity. This study found that such an accident would result in a latent cancer risk to the local population of between 30 to 300 fatalities. Accident related radiation exposure would also cause genetic effects, such as birth defects and other non-cancerous diseases, which were not calculated for this report. The study found that a populated area of 4.5 km² would be contaminated, as well as a 70 km downwind area of approximately 220 km². Although the study did not evaluate costs of clean-up, and losses due lost business and property devaluation, the study found that the whole town would have to be decontaminated, including buildings, streets, grass, etc. Further, this study found that the Ely water supply would be contaminated in concentrations high enough to require that the community utilize an alternative water supply. None of these issues have been addressed within the Repository DSEIS.

In the Repository FSEIS, DOE needs to make a realistic assessment of the risks to communities potentially bisected by both rail and highway transport routes for the spent

nuclear fuel and provide appropriate mitigation efforts to reduce the risk and provide compensation for otherwise unmitigable effects.]

- 3 [Of primary concern is atmospheric release of radionuclides originating from igneous activity, resulting in a radioactive plume that could both contaminate and cause radiation exposure to individuals over a wide geographic area. A second, though important, effect would be socioeconomic disruption and long term stigma effects on local economies, such as White Pine County. Substantial economic effects on tourism and the ability of White Pine County to attract and retain businesses and to maintain its traditional agriculture base could result. These issues are not addressed at all in the Repository DSEIS.]

Of further concern is groundwater contamination. While it is not likely that the ground water in White Pine County would be affected, contamination in Nye and possibly Clark Counties could cause stigma related effects on tourists passing through White Pine County to and from southern Nevada. Local government finances in Nevada involve distribution to rural areas of tax revenues derived in the State's metropolitan areas. Any stigma-induced downturn in the economy of the Las Vegas metropolitan area could have direct consequences upon the fiscal health of White Pine County. The Las Vegas Valley Water District has filed for groundwater rights in White Pine County. Degradation of southern Nevada water supplies could increase demand by Las Vegas for White Pine County water. The suite of issues has not been considered within the Repository DSEIS.]

- 4 [In completing the Repository FSEIS, DOE is encouraged to review the variety of impact assessment documents developed by White Pine County pursuant to its standing as one of ten counties designated by the Secretary of Energy as an affected unit of local government. Exhibit 2 includes a bibliography of Yucca Mountain related sponsored research prepared by White Pine County. The variety of repository system impacts which may result in White Pine County as described in the reports listed in Exhibit 2 are incorporated by reference as comments to the Repository SDEIS as the SDEIS fails to address the variety of impacts described in said documents.]

- 5 [White Pine County notes that the decision in 2006 by DOE to use a transportation aging and disposal canister (TAD) to transport (by rail), age and dispose of commercial spent nuclear fuel (Page 1-4, Repository DSEIS) has not been covered in any previous NEPA document. As a consequence, the decision by DOE to employ the TAD system was not made in compliance with the requirements of NEPA. Accordingly, the Repository Final SEIS must be expanded to provide NEPA analysis sufficient to support a decision by DOE to utilize the TAD system. It is recommended that the Purpose and Need statement in the Repository Final SEIS be expanded to include providing DOE with the information it needs to support a decision to implement a rail-dependent TAD-based repository system. Chapter 4 of the Repository Final SEIS should include analyses of the specific impacts associated with deployment of the TAD system, including transportation.]

Contrary to NEPA implementing requirements the Repository DSEIS does not analyze any alternatives to the Proposed Action (other than No Action. Alternatives to the

Proposed Action including implementation of mostly legal-weight truck and/or mostly overweight truck dependent TAD-based repository systems should have been analyzed fully in the DSEIS, particularly given that the Proposed Action analyzed in the Repository DSEIS includes implementation of a rail-dependent TAD-based repository system. Given the potential that a TAD-based rail-dependent repository system may be now (given the extensive environmental impact disclosed in the Rail Alignment DEIS) or may in the future become infeasible, the DSEIS should be fully capable of supporting DOE in making related decisions. Because Congress has directed DOE to pursue development of the repository at Yucca Mountain, DOE must provide adequate NEPA analysis of all alternatives which might ultimately be required to be implemented to comply with Congressional directive. DOE has limited the scope of alternatives analyzed in the DSEIS to such a degree so as to have limited its ability to comply with Congressional directive. Alternatives, including mostly legal-weight truck and/or mostly overweight truck; dependent TAD-based repository systems (among other possible alternatives) must be analyzed in detail within the Repository Final SEIS.]

6 [The Repository DSEIS fails to fully disclose potential repository system impacts beyond those generally identified through completion of analyses designed to meet the DOE-perceived requirements of NRC licensing. For example, the DSEIS analyzes radiological health impacts through atmospheric pathways only in those locales and to the extent thought by DOE to be required by NRC and fails to disclose similar potential effects to populations living within the region surrounding Yucca Mountain. Accordingly, full disclosure of potential repository system impacts as required by CEQ and DOE regulations for implementing NEPA has not occurred. As a decision support document for DOE (i.e. decision to implement rail-dependent TAD-based repository system), quite apart from the licensing requirements of NRC, the disclosure of impacts within the FSEIS must be broadened beyond the narrow requirements required of DOE by NRC for licensing.]

7 [White Pine County is downwind from the Nevada Test Site (NTS) and received high levels of radioisotope deposition (particularly on several readily accessible area mountaintops) as a result of above-ground weapons tests. As a consequence, the County is particularly concerned about potential atmospheric exposure pathways that may be associated with the Yucca Mountain project. On Page 5-3, Chapter 5 of the Repository DSEIS the definition of *reasonably maximally exposed individual* does not apply to atmospheric transport pathways but to groundwater transport. A separate definition of *reasonably maximally exposed individual* related assessment of exposure consequences is needed for atmospheric pathways. The FSEIS should include and analyze exposure consequences for different definitions of *reasonably maximally exposed individual* specifically defined for groundwater and atmospheric pathways.

On Page 5-10 of Section 5.1.1.4 of the Repository DSEIS, the justification given for not assessing population dose does not apply to inhalation resulting from the volcanic eruption modeling case atmospheric pathway. The FSEIS should include a population dose related to exposure/inhalation from the volcanic eruption modeling case atmospheric

pathway, similar to that provided for gaseous release of Carbon 14 on Page 5-31 of the DSEIS.

In the Repository DSEIS on Page 5-24 the definition of *reasonably maximally exposed individual* does not apply to atmospheric transport pathways but to groundwater transport. There is no acceptable definition of *reasonably maximally exposed individual* related to atmospheric pathways provided within the DSEIS. The FSEIS must include a definition for and analyze the consequences to *reasonably maximally exposed individual* relating specifically to atmospheric transport pathways associated with the Volcanic Eruption Modeling Case.

Page 5-25, Section 5.5 of the Repository DSEIS includes a definition of *reasonably maximally exposed individual* that is based upon climatological data found in the Repository FEIS (see Figure 3-3, Page 3-16). This data includes wind rose plots at 10 and 60 meters. The use of this data is inappropriate for use with Volcanic Eruption Modeling Case in which a volcanic plume would be at much greater heights where prevailing wind direction and speeds may be quite different than those at 10 and 60 meters. The Volcanic Eruption Modeling Case presented in the FSEIS should be based upon prevailing wind direction and speed data at an elevation commensurate with the height of the expected plume, which most certainly is greater than 10 to 60 meters.

At Page F-42 of Section F.4.2.1.2 of the Repository DSEIS the text indicates that members of the public would receive a radiation dose from exposure pathways for the contaminated ash layer. The DSEIS fails to consider inhalation prior to deposition on land surface and related acute and latent cancer risk. The FSEIS should consider the consequences of inhalation of radioisotopes prior to deposition on the land surface in further analysis of the Volcanic Eruption Modeling Case. The FSEIS should present the mean inhalation dose immediately following volcanic eruption and prior to ash deposition. The analysis of the Volcanic Eruption Modeling Case in the FSEIS should not be limited to only NRC required analysis of impacts but should consider the full range of impacts, even to the extent they are extra regulatory, for purposes of NEPA disclosure.]

8 [The text on Page 6-5, Section 6.1.6 of the Repository DSEIS indicates that “impacts from the use of overweight trucks for shipments of spent nuclear fuel would be similar to the impacts from the use of legal-weight trucks”. Over-weight trucks, weighing as much as 35,000 pounds or 17.5 tons more than legal-weight trucks would result in greater damage to highway surfaces and structures than legal-weight trucks. Accident severity would also likely be increased for over-weight trucks than it would be for legal-weight trucks. The specialized heavy-duty equipment required to recover over-weight trucks in the event of vehicle breakdown or an accident would be different than that required for legal weight trucks. The FSEIS should correctly disclose the greater degree of impact which will be associated with use of overweight trucks. Alternative measures to mitigate impacts associated with the use of overweight trucks must be described in Chapter 9 of the FSEIS.]

- 9 [Absent from the Repository DSEIS is a re-analysis of the environmental costs and benefits of mostly rail versus mostly truck modal alternatives. DOE's 2002 Yucca Mountain FEIS was based upon significantly fewer numbers of truck shipments (1,100 versus 2,700 in the Repository DSEIS) resulting from use of the mostly rail mode. An analysis should be included in the Repository DSEIS which either validates or suggests changing DOE's previous decision to utilize a mostly rail modal choice.

By default, the Proposed Action in the Repository DSEIS includes shipment by legal or overweight truck of approximately 2,700 casks. However, the analysis of impacts to most resources in Section 6.4 of the Repository DEIS is limited to the region of influence for the Caliente and Mina rail alignments. Appendix J of the Yucca Mountain FEIS included public health and safety impacts for a variety of alternative highway transportation routes through Nevada. A similar comparative analysis, reflecting the greatly increased number of truck shipments is not provided in the Repository DSEIS. Consequently, it is not possible to discern which of many possible highway routes through Nevada poses the least amount of impacts under the 2,700 truck cask Proposed Action scenario. The Repository FSEIS must include a comparative analysis, reflecting the greatly increased number of truck shipments, and the impacts of using various highway routes in Nevada on various potentially impacted resources, particularly socioeconomics. White Pine County believes the Repository FSEIS must at least disclose the possible social, economic and fiscal impacts and the incident-free and accident public health risks of transporting up to 2,700 truck casks of SNF/HLW over a fifty-year period through the County (DOE has failed to address these issues in Section 6.4.1.10 and Section 6.4.1.11 of the Repository DSEIS, respectively).]

- 10 [DOE does not anticipate that any activities associated with the construction or operation of the repository will impact the County. However, White Pine County believes there may be employment impacts due to transportation, material, and manpower needs associated with construction and operation of the Yucca Mountain repository.

If White Pine County or the City of Ely experience out-migration due to stigma effects of being located on a transport corridor for high-level nuclear waste, reduced property values, and/or loss of potential new residents may result and there will be a negative impact on employment.

There are no DOE scenarios of the Yucca Mountain repository that anticipate an impact (positive or negative) on the population of White Pine County or the City of Ely presented in the Repository DSEIS. There are, however, two scenarios, not identified by DOE that might result in a negative impact on population. First, employment opportunities at the repository might encourage an outflow of residents as they seek employment closer to the site. Second, if there are stigma-related effects, some residents may choose to leave and other potential new residents may decide to look elsewhere for a community that is not associated with the transport of high-level nuclear waste. The majority of the urbanized area in Ely, McGill and the Preston/Lund community areas along potential highway transportation routes through White Pine County is within the 800 meter corridor utilized in the RADTRAN transportation risk model as the assumed

radiological exposure zone. Along the Ely-McGill and Preston-Lund highway corridors, agriculture, an activity highly sensitive to stigma, is the predominant land use (approx. 800 acres) within the 800 meter risk zone.]

- 11 [The emergency management systems in White Pine County and the City of Ely will be impacted due to the Yucca Mountain repository. Additional legal and/or overweight trucks on the roads will place further demands on emergency management personnel (staff and volunteers) and equipment. These issues are not addressed in the Repository DSEIS.

In addition to enhancing capabilities to effectively handle "normal" incidents due to repository related activity, these same emergency management systems must also be capable of responding to an accident that involves radiation contamination and/or a release of radiation into the environment. White Pine County and the City of Ely can expect that if there is a radiological incident within their jurisdictions local emergency response teams will be the first responders. It is likely that additional support may not arrive for 4 to 5 hours.

White Pine County and the City of Ely rely on volunteer and professional fire fighters and emergency medical technicians (EMT) for emergency management. At this time the professional and volunteer emergency management personnel are not adequately trained in the event of a radiological accident. The potential for untrained local first responders to be responding to emergencies involving hazardous and radiological materials may harm rather than help the community and may expose White Pine County to legal liability. This situation must be rectified before high-level nuclear waste and spent nuclear fuel canisters are transported through the County. Chapter 9 of the Repository DSEIS should identify mitigation to address these issues.

If there are trucks carrying high-level nuclear waste through White Pine County, there will need to be an effective evacuation plan for residents in McGill and Ely. The Sheriff's Department is the lead agency and is responsible for emergency evacuations. The Sheriff's Department does not have a written plan for evacuating the City of Ely. The White Pine County School District is responsible for providing the use of County schools as evacuation centers and to provide transportation as needed. The School District does not have a known written plan for evacuation. In the event of an emergency requiring evacuation, the William Bee Ririe Hospital would be responsible for safely evacuating patients. A written emergency evacuation plan for the facility does not exist. The Ely Fire Department has a secondary role in the emergency evacuation of Ely. The Ely Fire Department does not have a written evacuation plan. White Pine County will need to develop an effective and coordinated evacuation plan, training programs for all relevant agencies, a method of educating the public about the plan, and a public address system for informing the public if there is an emergency that requires evacuation.

The maximum security prison located north of Ely and approximately 9 miles west of U.S. 93 will also need to develop a plan for safely evacuating inmates in the event of a radiological release in coordination with White Pine County emergency personnel. An

accident could pose very serious problems for this facility. In addition, hard to evacuate persons (i.e. persons with disabilities and home or institution-bound sick and elderly) are located in various private homes and private and public institutions. Special consideration will be required in developing and implementing effective plans to evacuate such persons. DOE's EISs fail to consider the unique set of issues and impacts associated with developing and implementing effective evacuation plans.

12 [Chapter 8 of the Repository DSEIS fails to analyze any cumulative impacts associated with the 2,700 truck shipments of SNF/HLW. As a consequence, no NEPA coverage exists to support the DOE decision to utilize a mostly rail modal choice involving 1,800 more truck shipments than was analyzed in the Yucca Mountain FEIS.]

13 [In both the Repository DSEIS and Rail Alignment DEIS, DOE has inappropriately mixed the use of "best management practices" (BMPs) and mitigation. BMPs for which DOE is committed to implement should have been described in Chapter 2 of each NEPA document. Having identified those specific BMPs to which it was committed to implementing, the analysis of impacts in Chapters 4,5, 6 and 7 of each NEPA document should disclose impacts resulting "after" implementation of BMPs DOE has committed to implement. Mitigation, as defined by CEQ and DOE regulations for implementing NEPA, are those actions designed to avoid, minimize, reduce, rectify or compensate for impacts resulting from the Proposed Action and alternatives "after full implementation of committed to BMPs". The DSEIS improperly includes BMPs as mitigation. Accordingly, it is not possible to know which, if any, BMPs DOE is committed to implementing as a part of the Proposed Action and which were considered a priority in analyzing impacts resulting from said action.]

14 [In Table 9-1 of the Repository DSEIS, reasonable alternatives for mitigation should have been discussed with detail provided for those that DOE is prepared to commit to and describe in a subsequent Mitigation Action Plan. DOE's regulations for implementation of NEPA suggest that a mitigation action plan either precedes or follows issuance of a Record of Decision. If DOE does not intend, as it has stated, to issue a Record of Decision subsequent to issuance of the FSEIS, it is not clear when and for what reason DOE would be compelled to prepare a mitigation action plan. The FSEIS should describe in detail the relationship between any ROD to result from the FSEIS, related mitigation action plan and how DOE understands either one or both of those documents will be considered during the subsequent NRC licensing proceeding for Yucca Mountain.

Chapter 9 of the Repository DSEIS does not specifically identify reasonable measures to mitigate impacts identified in Chapters 4,5,6 and 7. Table 9-1 lists BMPs, which as discussed above are not mitigation. The DSEIS indicates that DOE is "evaluating the preparation of a Mitigation Action Plan that identifies specific commitments for mitigation of adverse environmental impacts due to the Proposed Action." The DSEIS further states, "The Mitigation Action Plan would incorporate all practicable measures to avoid or minimize adverse environmental and health impacts that could result from the Proposed Action..." NEPA implementing regulations require that all practicable measures to avoid, minimize, and rectify, reduce or eliminate, or compensate for impacts

be identified in the DSEIS, including those that may be outside the jurisdiction of DOE to implement. NEPA regulations further prohibit DOE from eliminating certain alternatives for mitigation from disclosure because they are unlikely to be adopted or enforced by DOE. The FSEIS must include disclosure of a comprehensive suite of possible measures to mitigate impacts of the Proposed Action and any action alternatives, including impacts associated with national and Nevada transportation. The expected contribution of each identified measure with regard to mitigation of impacts must be described in the FSEIS.]

18 [With regard to specific measures to mitigate impacts resulting from development and operation of the Yucca Mountain repository system, including truck transportation, in White Pine County, the Repository DSEIS contains none. White Pine County has completed a preliminary analysis of the impacts of the Yucca Mountain repository system on the County, including identification of alternative measures to mitigate impacts (White Pine County, 2001). DOE is strongly encouraged to review this report and to incorporate various descriptions of repository system impacts to White Pine County in the Repository FSEIS. Exhibit 1 provides White Pine County suggested measures to mitigate repository system impacts in the County. Chapter 9 of the Repository DSEIS should be expanded to include a full range of measures to mitigate impacts of the repository system, drawing particularly from the attached Exhibit 1.]

15 [DOE's Rail Corridor DSEIS inappropriately concludes that the Mina Corridor is feasible and should be carried forward for detailed analysis. DOE knew at least five months before publication of the Rail Corridor DSEIS that the Walker River Paiute Tribe had withdrawn their support for the NEPA analysis of the rail line across Reservation lands and that the Tribe had taken a position opposing transportation of SNF/HLW across their Reservation. As an infeasible alternative, it is inconsistent with NEPA for DOE to describe the Mina Corridor as a Proposed Action and to conduct any detailed analysis of the Mina Corridor for purposes of NEPA compliance. The DOE should withdraw the Rail Corridor DSEIS from further action and consideration. Alternatively, given that the Mina Corridor is no longer feasible, the FSEIS should identify the corridor as an alternative considered but eliminated from detailed analysis.]

16 [The Rail Corridor DSEIS (at Page 2-11, Section 2.3) that the No Action alternative is "... DOE would not construct and operate a railroad within the Mina rail corridor from Wabuska to Yucca Mountain." DOE has been directed by the Congress to seek a license from the NRC to construct and operate the Yucca Mountain geologic repository therefore DOE must anticipate that it will be required to transport SNF/HLW to the site. No Action can not mean no transport of SNF/HLW to Yucca Mountain. Without the Mina rail corridor, No Action must involve some other method or methods to move radioactive waste. Accordingly the No Action alternative in the FSEIS should be broadened to include alternative means of transporting SNF/HLW to Yucca Mountain, particularly the use of legal and/or overweight trucks. Impacts of such a re-defined No Action must be fully analyzed in Chapter 4 of the Rail Corridor FSEIS.]

17 [It is White Pine County's belief that to adequately respond to the aforementioned comments to DOE's October 2007 NEPA reports DOE must; a) modify alternatives

including the proposed action; b) develop and evaluate alternatives not previously given serious consideration by DOE; c) supplement, improve or modify analysis contained with the EISs; and/or d) make factual corrections to the EISs. White Pine County is of the opinion that the inadequacies of the DOE NEPA documents are of such a degree so as to warrant that DOE re-issue the revised draft NEPA documents for further public review and comment.]

Reference Cited

White Pine County Board of Commissioners, *Yucca Mountain Repository Program Interim Impact Assessment Report for White Pine County, Nevada, on a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada*, Prepared for Honorable Spencer Abraham, Secretary of Energy, August 2001.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

Mike Simon
Director

Cc: Affected Units of Local Government
Nevada Agency for Nuclear Projects
Nevada Congressional Delegation

Exhibit 1

**White Pine County
Yucca Mountain Repository Oversight and
Impact Alleviation Planning Program
Bibliography of Sponsored Research and
Official County Comments to the Yucca Mountain Project
1993-2007**

**White Pine County
Yucca Mountain Repository Oversight and
Impact Alleviation Planning Program
Bibliography of Sponsored Research and
Official County Comments to the Yucca Mountain Project
1993-2007**

**Prepared For:
Board of White Pine County Commissioners
801 Clark Street #4
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**Prepared By:
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December 2007

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Introduction

Since the early 1990's, White Pine County has monitored activities of the U.S. Department of Energy to evaluate Yucca Mountain as a site for locating a high-level radioactive waste repository. Pursuant to Congressional directive, annual funding for County repository oversight initiatives is provided by the DOE's Office of Civilian Radioactive Waste Management. In undertaking its repository oversight program, the County has sponsored a wide variety of studies. The results of these research endeavors have been used by the County in formulating responses to DOE Yucca Mountain repository development initiatives (including transportation systems) and in providing information to area residents. The ability of the County to provide DOE with quality input has typified its oversight program and is the result of making effective use of the independent research described within this document.

White Pine County is one of ten units of local government which have been designated by the Secretary of Energy as an "affected unit of local government" pursuant to the Nuclear Waste Policy Act, as amended. What was identified in the DOE's Yucca Mountain environmental impact statement remains true today: White Pine County is crossed by the likely highway route to be designated by Nevada's Governor for most truck shipments of high-level radioactive wastes entering Nevada and destined for storage and disposal at the Nevada Test Site. More recently, it has become evident that mutual interests of the State of Nevada and DOE to minimize risks to the health and safety of a majority of Nevada's residents and economy of southern Nevada will likely shift said risks to residents and businesses of White Pine and other rural counties. Such risk minimization objectives have been translated into federal legislation recently passed by the Congress which admonishes DOE to avoid shipping spent nuclear fuel (SNF) and other high-level radioactive waste (HLW) destined for Yucca Mountain through the Las Vegas metropolitan area. In response to efforts by the State of Nevada and DOE to shift risks away from Nevada's populated areas, the Board of White Pine County Commissioners has responded with recommendations focused at rural risk minimization and benefit maximization.

During the past decade, White Pine County has conducted an effective repository oversight and impact alleviation planning program. The County has established White Pine Nuclear Waste Advisory Committee to lend guidance to repository oversight and independent impact assessment activities. Since its organization, the Committee, has met no less than 32 times and has invested over 500 hours of largely volunteer time to understand the implications of the Nation's nuclear waste management program to White Pine County.

Utilizing funding provided by DOE pursuant to Section 116 (c) of the Nuclear Waste Policy Act, as amended, the White Pine County Nuclear Waste Project Office has overseen the preparation of over 20 reports documenting repository system implications

for White Pine County. Topics addressed within these studies include emergency response, transportation routing, economic/demographic, impact assessment, transportation risk assessment, tourism impact assessment, and fiscal impact assessment, among others. The numerous studies sponsored by the County have utilized teams of highly trained and competent researchers representing both academic and private entities. The extensive information base represented by these studies has been thoroughly utilized by the County in responding to continuing activities by DOE to plan for the transportation of SNF/HLW through White Pine County and the disposal of said nuclear waste at the Yucca Mountain repository site.

This report provides a comprehensive list of references resulting from the White Pine County repository oversight program. Copies of documents described herein are available for review at the White Pine County Nuclear Waste Project Office (Ely, Nevada).

The listing of joint White Pine County repository oversight program research products which follows has been organized by general topic. It is important to note, that many of the documents address cross-cutting issues and as a result may be useful in considering multiple aspects of the nuclear waste management issue.

Economic/Demographic

The development and operation of interim storage and permanent disposal and related transportation systems for nuclear waste in Nevada may impact upon local economic and demographic conditions within White Pine County. Consequences of DOE waste management activities may be both positive (desirable) and negative (undesirable) in nature. Economic impacts include for example changes in employment, income and local industrial activity. Demographic changes might include local population growth or decline, alterations in the distribution of residents among County communities, and variances in the numbers of residents among various age, sex, and racial groupings. Economic/demographic research sponsored by the County has been conducted to enable better understandings of past, present, and potential characteristics of these parameters. In addition, these studies have assisted the County in designing and implementing strategies for alleviating potential repository system impacts.

Stoddard, S., Ferguson, K., Ghimire, B., Rothrock, D., Marshall, A., Wood, T., Harris, T., and Atkinson, G., *A Profile of White Pine County Economy: Growth, Structure and Cyclical Change*. Project Funded by United States Department of Energy, n.d.

FY1995

Intertech Services Corporation, *Rural Non-Situs County Views of "Standard" Socioeconomic Impacts of Federal Nuclear Waste Activities*. A Presentation on Behalf of Inyo, Esmeralda, Mineral, Churchill, Lander, Eureka, White Pine and Lincoln Counties, January 1995.

Transportation

DOE's Yucca Mountain environmental impact statement identified and evaluated potential impacts of routing truck shipments of SNF/HLW through White Pine County along U.S. Hwy 93 south to U.S. 93/50/6 and then south along U.S. 6 leaving the southern portion of the County enroute to the Yucca Mountain site. This route has been identified by the State of Nevada as a candidate for designation by Nevada's Governor as a means to prevent shipments from passing through the Las Vegas metropolitan area. White Pine County is then crossed by the likely highway route to be designated by Nevada's Governor for most truck shipments of high-level radioactive wastes entering Nevada and destined for storage and disposal at the Nevada Test Site.

DOE's recent environmental impact statement for the Yucca Mountain repository project recognizes the potential for Nevada's Governor to designate a route through White Pine County for truck shipments of SNF/HLW headed for Yucca Mountain. Transportation studies sponsored by White Pine County have been designed to assess and develop measures for reducing related impacts.

FY1996

University of Nevada Las Vegas Transportation Research Center, Howard R. Hughes College of Engineering, *Risk Analysis for Spent Nuclear Fuel Transportation Through White Pine County Highway Route, UNLV/TRC/RR-95/9*. Prepared for Intertech Services Corporation, October 1995, Revised January 1996.

FY2000

University of Nevada Las Vegas Transportation Research Center, Howard R. Hughes College of Engineering, *Risk Assessment of Highway Transport and Inter-modal Operations and Identification of Measures to Mitigate Accident Risks, UNLV/TRC/99-04, January 2000*.

Papez, Luke C., *The County Atlas: A Geographic Information Systems Representation of White Pine County, Nevada*, prepared for the White Pine County Nuclear Waste Project Office, August 2000.

FY2002

Intertech Services Corporation, *Hazardous Material Transport via Rail: Bibliography of Recent Risk Assessment Literature*. Prepared For the Joint City/County Impact Alleviation Committee, June 2002.

Intertech Services Corporation, *White Pine County Spent Nuclear Fuel/High Level Nuclear Waste Transportation Incident Frequency Report*. Prepared for White Pine County Nuclear Waste Project Office, August 2002.

Intertech Services Corporation, *Possibility of Nuclear Incidents Occurring in White Pine County During the Transportation of High-Level Nuclear Waste to A Proposed Repository at Yucca Mountain*. Prepared for Board of White Pine County Commissioners, October 2002.

FY2003

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Emergency Management

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Impact Assessment

Virtually all of the previously listed studies have been performed to support assessment of the consequences of federal nuclear waste management activities in White Pine County. To enable the County and City to properly assess impacts, various frameworks and models have been developed. The models utilize computer spreadsheet technology and are easily useable by County staff.

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Mackenzie, Carol, Chairman, White Pine County Board of Commissioners, *Department of Energy (DOE) Price-Anderson Act Comments from White Pine County, Nevada*. Prepared for White Pine County Board of Commissioners, February 1998.

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Noriega, Cheryl, Vice-Chairman, White Pine County Board of Commissioners, *Consideration of State of Nevada Identified Alternate Highway Routes Within the Draft Yucca Mountain Environmental Impact Statement*. Prepared for White Pine County Board of Commissioners, February 1999.

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Kirkeby, Kevin, *Testimony on the Adequacy of the Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada*. Prepared for White Pine County Board of Commissioners, October 1999.

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To Obtain Copies of Documents

Single copies of documents listed within this bibliography may be obtained by contacting:

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Exhibit 2
White Pine County Suggested Measures to Mitigate Impacts
Of the Yucca Mountain Repository System in the County

Impact Area	Avoid	Minimize	Rectify	Reduce/Eliminate Over Time	Compensate
Radiation Exposure	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 	<ul style="list-style-type: none"> • Use strategies to reduce stops during transport and insure that stops are in non-populated areas • DOE should improve the safety of the shipping containers to minimize the likelihood of a release into the environment in the event of a transport accident • Consider the rail only option as a means of reducing radiation exposure • Build a by-pass highway around the communities of Ely and McGill 	<ul style="list-style-type: none"> • Develop decontamination plan and fund implementation through trust fund for human and environmental exposure to radiation 	<ul style="list-style-type: none"> • If unacceptable levels of radiation are detected in the County, implement changes in practices to reduce levels 	<ul style="list-style-type: none"> • Fund White Pine County for staffing and equipment to implement independent monitoring and oversight of radiation levels. • Fund doctors and medical staff in White Pine County for training to identify and treat radiation sickness • Establish advance commitment to provide compensation for White Pine County in the event that heightened radiation levels are detected, due to normal activities or in the event of an accident that results in a breach of containment

Employment	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 		<ul style="list-style-type: none"> • Overcome stigma through public information and regional marketing strategy • Establish trust fund to enable immediate implementation of marketing/education strategy 	<ul style="list-style-type: none"> • On-going public information • On-going regional marketing strategy 	<p>(The goal is to maximize job opportunities)</p> <ul style="list-style-type: none"> • Locate ancillary office functions in White Pine County • DOE should commit to local procurement policies within the State of Nevada and White Pine County
Income	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 		<ul style="list-style-type: none"> • Overcome stigma through public information and regional marketing strategy • Establish trust fund to enable immediate implementation of marketing/education strategy 	<ul style="list-style-type: none"> • On-going public information • On-going regional marketing strategy 	<p>(The goal is to maximize local income benefits)</p> <ul style="list-style-type: none"> • DOE should establish procurement policy that would increase purchases of goods and services from White Pine County • Locate ancillary office functions in White Pine County
Population		<ul style="list-style-type: none"> • Area quality of life initiatives • Risk communication and public education 			

<p>Emergency Management</p>	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 	<ul style="list-style-type: none"> • Cross training and reciprocal agreements with other impacted communities and DOE • Adhere to strict safety standards and operating procedures • Minimize the time for supporting personnel and equipment to arrive at the scene of an accident • Provide guidance and insure that community has the appropriate level of training and equipment • Clarify responsibilities in response procedures between federal, state, and local governments • Locate critical or difficult to move equipment in White Pine County to reduce response times. • To the degree that DOE takes responsibility for emergency management for all incidents involving the nuclear waste casks this will reduce the overall impact on White Pine County 	<ul style="list-style-type: none"> • Establish equipment decontamination replacement strategy • Establish emergency response/medical supply replacement strategy • Establish trust fund to allow immediate decontamination and/or replacement of equipment and supplies 	<ul style="list-style-type: none"> • DOE to implement a continual evaluation (external audit) of the transport safety procedures and establish improved safety protocols as the need is identified 	<ul style="list-style-type: none"> • Funding to purchase additional baseline equipment and equipment for radiological incident • Funding for additional staff for increased non-radiological and radiological incidents • Funding for continuing training in emergency management of radioactive material • Contingency for grants to reimburse the County for costs incurred during any incident related to repository activity. • Funding to develop and publicize an evacuation plan for the communities. • Funding to acquire and operate emergency notification system • Funds to upgrade emergency communication equipment and ensure that different departments have capability to communicate with each other
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<p>Emergency Medical</p>	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 	<ul style="list-style-type: none"> • Cross training and reciprocal agreements with other impacted areas and DOE • Develop a standard of competency for radiological medical treatment and ensure that staff meet the minimum requirements • Transport of spent nuclear fuel and high-level waste along routes that avoid White Pine County 	<ul style="list-style-type: none"> • Establish equipment decontamination and supply replacement strategy • Set up trust fund to allow immediate implementation of decontamination/resupply strategy 		<ul style="list-style-type: none"> • Funding to purchase additional equipment and hire additional staff • Contingency for grants to reimburse the County for costs incurred during any incident related to repository activity. • On going radiological training for medical staff • Funds to modify hospital to provide capability for quarantine • Funds to develop an evacuation plan for the hospital and educate staff
<p>Local Oversight</p>	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 	<ul style="list-style-type: none"> • DOE to provide information and maintain good communication with the local oversight staff • Strong independent state/NRC oversight • Provide for continued local oversight evaluation 	<ul style="list-style-type: none"> • Provide for continued local oversight evaluation 	<ul style="list-style-type: none"> • Provide for continued local oversight evaluation 	<ul style="list-style-type: none"> • Funding for independent local oversight and monitoring during site characterization, construction, emplacement, and pre-closure activity

<p>Local Government Finance</p>	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada • Fully fund all fiscal impacts in advance 	<ul style="list-style-type: none"> • Minimize stigma • Reduce lag-time between impact detection and mitigation implementation 	<ul style="list-style-type: none"> • Develop and implement regional marketing program • Budget supplements for unanticipated expenses 	<ul style="list-style-type: none"> • Develop and implement regional marketing program 	<ul style="list-style-type: none"> • Grants to local govts. if repository impacts require additional staff • Compensate local governments for capital outlays if stigma-induced effects reduce population • Payments sufficient to cover all possible recurring impacts (PETT)
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<p>Highway Transportation Accident Risk</p>	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 	<ul style="list-style-type: none"> • Special lanes for trucks • lead and follow cars • special warning lights and signs • Elimination of at grade railroad crossings on public roads and highways • Special signage on private railroad crossings • Restrictions on truck movements in inclement weather and over Murry Summit • DOE should evaluate the safety characteristics of the two-lane roads that may be utilized • DOE should fund and staff a weather monitoring and communication system to advise transport operators and County staff • Lane separation on Murry Summit • Build a by-pass highway around Ely and McGill • Enhanced winter road condition maintenance 	<ul style="list-style-type: none"> • Local control and management • participation in accident assessments • Highway upgrades and enhanced maintenance 	<ul style="list-style-type: none"> • Monitor for accidents and adjust safety procedures to eliminate additional risk • DOE to implement a continual evaluation (external audit) of the transport safety procedures and to modify protocols as the need is identified 	<ul style="list-style-type: none"> • Funding for the County to cover costs of any safety mechanisms that DOE does not implement directly • Contingency for grants to reimburse the County for costs incurred during any incident related to repository activity.
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<p>Tourism</p>	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 	<ul style="list-style-type: none"> • Maintain impeccable safety record for the repository system • Develop and implement risk communication plan • Develop and implement on-going regional marketing strategy • Area quality of life initiatives 	<ul style="list-style-type: none"> • Maintain impeccable safety record at the repository and the intermodal facility • Enhanced risk communication • Enhanced regional marketing initiatives • Area quality of life initiatives 	<ul style="list-style-type: none"> • Maintain impeccable safety record for the repository system • Sustained education and risk communication campaign • Sustained regional marketing initiatives • Area quality of life initiatives 	<ul style="list-style-type: none"> • Grants to White Pine County to fund advertisements and to enhance marketing plans • A contingency agreement to compensate White Pine County in the event that tourism is affected due to the repository system
<p>Economic Development</p>	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 	<ul style="list-style-type: none"> • DOE policy that favors White Pine County for purchase of minerals and finished products • Establish satellite offices for the repository in White Pine County • Maintain impeccable safety record at the repository and the intermodal facility • Develop and implement risk communication plan • Develop and implement on-going regional marketing strategy 	<ul style="list-style-type: none"> • Maintain impeccable safety record at the repository and the intermodal facility • Maintain impeccable safety record at the repository and the intermodal facility • Enhanced risk communication • Enhanced regional marketing initiatives 	<ul style="list-style-type: none"> • Maintain impeccable safety record at the repository and the intermodal facility • Sustained education and risk communication campaign • Sustained regional marketing initiatives 	<ul style="list-style-type: none"> • A contingency agreement to compensate White Pine County if businesses that were planning on locating in the County reverse their decision based on the repository system • A contingency agreement to compensate White Pine County if immigrants that were planning on locating in the County reverse their decision based on the repository system

Real Property	<ul style="list-style-type: none"> • Do not construct and operate interim storage or permanent radioactive waste disposal capability in Nevada 	<ul style="list-style-type: none"> • Maintain impeccable safety record for the repository system • Develop and implement risk communication plan • Develop and implement regional marketing plan • Develop and implement property enhancement plan • DOE investments in community assets 	<ul style="list-style-type: none"> • Maintain impeccable safety record at the repository and the intermodal facility • Develop and implement property enhancement plan • DOE investment in community assets 	<ul style="list-style-type: none"> • Maintain impeccable safety record at the repository and the intermodal facility • Develop and implement property enhancement plan • DOE investments in community assets 	<ul style="list-style-type: none"> • Establish pre-project property value database and monitor for changes in property values along the transport corridor • Compensation for property owners along transportation routes and throughout the community if property values decline due to repository system
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Source: White Pine County Board of Commissioners, *Yucca Mountain Repository Program Interim Impact Assessment Report for White Pine County, Nevada, on a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada*, Prepared for Honorable Spencer Abraham, Secretary of Energy, August 2001.