



Department of Energy

Washington, DC 20585

November 23, 2011

Mr. Ralph Phelps, Chair
Northern New Mexico Citizens Advisory Board
1660 Old Pecos Trail, Suite-B
Santa Fe, New Mexico 87505



Dear Mr. Phelps:

Thank you for your September 19, 2011, letter recommending that we identify waste that could be transported for disposal by rail instead of highway, and improve communication with local communities impacted by the loading and unloading of the waste from one conveyance to the other. Within the Office of Environmental Management (EM), we routinely look at our transport options when we begin transportation planning. We have had great success using rail for shipments to both EnergySolutions in Clive, Utah, and the Nevada National Security Site (NNSS). As stated in your recommendation, the use of a truck-to-rail transload facility in Antonito, Colorado, to support the Los Alamos National Laboratory cleanup activities could have been successful with early engagement with the local community. This has certainly been our practice for many other shipping campaigns, and we have learned some significant lessons from this particular campaign related to providing detailed information and education to our affected stakeholders.

For the period of fiscal years (FY) 2004 through 2010, EM shipped over 35,000 railcars of waste for disposal to EnergySolutions and NNSS. We continue to look at the advantages of using rail versus highway. Some of the factors in our decision-making process include distance, existing rail service or a nearby transload facility, volume, type of material, and costs. It is also prudent for us to review our mode of transport in addressing the Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, which requires Government agencies to reduce the greenhouse gas emissions.

We have had some very successful rail campaigns within EM that assisted in the completion of the cleanup activities ahead of schedule. Part of the process was the early coordination and collaboration with the stakeholder community. In an effort to ensure consistent planning and execution of off-site transportation activities, the Department issued the Department of Energy (DOE) Manual 460.2-1A, *Radioactive Material Transportation Practices Manual*, which establishes a set of standard transportation practices for DOE organizations to use in planning and executing off-site shipments of radioactive materials including radioactive waste. These practices establish a standardized process and framework for interacting with State, Tribal, and local authorities, transportation contractors, and carriers regarding DOE radioactive material shipments. This document was developed under the Transportation External Coordination Working Group (now the National Transportation Stakeholders Forum), which was established to improve communications with external groups impacted by our shipping activities.



One of our early successes using rail involved cleanup activities at the Fernald Closure Project (FCP). In early planning, FCP determined that rail would be the most effective way to move bulk waste to EnergySolutions for disposal. Both the generator site and disposal site (EnergySolutions) had direct rail access. Through early planning and analyses, it was determined the best solution for the estimated 1,200,000 tons of waste was the use of unit trains (40 or more railcars of the same material, origin, and destination). A total of 12,000 railcars, totaling 201 unit trains, were shipped between 1999 and 2006. In addition to FCP, there has been successful use of rail for waste shipments from other DOE waste generators. Generator sites using rail for shipments to Clive, Utah, include Rocky Flats, the Savannah River Site, Oak Ridge, and Mound.

Another success was using a transload facility in 2006 when the West Valley Demonstration Project (WVDP) began shipping waste drums to NNSS for disposal. While initial shipments were made by truck, this method was abandoned in early 2007 in favor of rail due to the total cost for truck transport (one gondola car was equal to five trucks). The railcars were loaded at WVDP in New York, and then proceeded on a 2,500-mile trip to Parker, Arizona, where they were off-loaded at a rail-to-truck transload facility. The remaining 200-mile journey to NNSS, which is not serviced by rail, was completed by highway. NNSA recently issued a draft Site-wide Environmental Impact Statement (SWEIS) that assesses the advantages of using rail-to-truck transload facilities for shipments destined to their site. The SWEIS identifies several existing rail transload facilities that could be used by waste generator sites for waste destined for disposal at NNSS.

We will continue to evaluate the risks, costs, and efficiencies of our cleanup activities as they relate to the use of rail versus highway. Safety will continue to be our major focus, and we are committed to improving our communications with the impacted communities through the National Transportation Stakeholders Forum (NTSF) and our interaction with the Regional Government Groups (Western Governors Association, Southern States Energy Board, and the Northeastern and Midwestern Council of State Governments). Under the NTSF, we have established a Communications Working Group that will enhance DOE public information materials addressing transportation activities used by States, regional groups, Tribes, and the public.

If you have any further questions, please contact me or Ms. Cate Alexander, Designated Federal Officer, Environmental Management Site-Specific Advisory Board, at (202) 586-7711.

Sincerely,



David Huizenga
Acting Assistant Secretary for
Environmental Management

cc: C. Alexander, EM-42
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