



Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

**PRELIMINARY DRAFT ENVIRONMENTAL ASSESSMENT
INTERMODAL TRANSPORT OF LOW-LEVEL RADIOACTIVE
WASTE TO THE NEVADA TEST SITE**

INTRODUCTION

The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) reviewed the Department of Energy's (DOE) Preliminary Draft Environmental Assessment (EA) of Intermodal Transport of Low-Level Radioactive Waste (LLW) to the Nevada Test Site (NTS). We appreciated having an opportunity to review the Preliminary Draft EA.

The EA appears to support a decision making process with an appropriate objective—to route shipments of LLW for disposal at NTS so as to avoid transportation through the Las Vegas metropolitan area and over Hoover Dam. The case for that objective is well presented in the purpose and need section of the EA. While the EA offers little evidence that intermodal transportation to NTS is inappropriate, the INEEL CAB believes additional analysis would support an enhanced decision based more thorough analysis and more complete data. We submit the following recommendations for improving the document before it is finalized and a Record of Decision is formulated.

RECOMMENDATION

- 1. The INEEL CAB recommends that DOE clarify the proposed action, confirm the need to prepare NEPA documentation, and consider coordination with other agencies.**

The INEEL CAB understands that NEPA documents support federal agency decision making. We therefore noted this quotation with confusion: "DOE-NV will use the results of the assessment to decide whether or not to encourage the LLW generators and their transportation contractors to change their current operations to accomplish these objectives. The DOE doesn't have the legal authority to require the use of particular transportation modes and routes."

We recommend that DOE reconsider its approach to achieving the desired results. Those results might be better achieved through the coordinated participation of other appropriate and involved agencies (Department of Transportation, for example) as cooperating preparers of the NEPA documentation. DOE should clarify the proposed action and determine if NEPA documentation is even appropriate.

- 2. The INEEL CAB recommends that the EA address the impacts of another alternative that would allow both intermodal and total truck options as long as the routing can avoid Las Vegas and Hoover Dam economically.**

As it is presently configured, the EA compares a "No Action" alternative (using current modes of transport and current routes) against one alternative that assessed exclusive use of intermodal transportation and another that assessed exclusive use of all-truck routes. We noted the absence of another feasible alternative that would evaluate the possibility of giving shippers more discretion and allow a choice of intermodal and total truck options. We note that shipments from INEEL and Hanford might be more economical using total truck, but recognize that intermodal would be preferred for

shipments from the eastern DOE sites. This combination alternative would be consistent with the statement that the DOE's Nevada Operations Office (DOE-NV) "does not intend to recommend a single alternative." In the spirit of the National Environmental Policy Act (NEPA), we recommend that the EA evaluate the impacts of all reasonable alternatives that meet the purpose and need for action.

3. The INEEL CAB recommends that the EA address the impacts of operating two intermodal facilities, including one in Caliente, Nevada, and another in Yermo, California.

Neither facility would be ideal for all LLW destined for shipment to NTS. As it appears that the impacts of constructing the necessary facilities are minimal, we urge DOE to consider operating two facilities to support economical transportation from points west and east of the NTS.

4. The INEEL CAB recommends that DOE consider the option of using a road that could provide direct access between State Road 375 and the NTS.

The distance that would be traveled by LLW truck shipments coming from the east intermodal site at Caliente, NV could be decreased significantly if DOE were to use a road allowing direct access between State Road 375 and the NTS to avoid requiring the use of existing roads through Tonopah, Nevada. More detailed maps than those presented in the EA indicate that existing roads might provide options; road upgrades and new construction are additional options. We are aware of the infrastructure and topological challenges that this recommendation might entail (i.e., mountainous terrain, protection of Desert Bighorn Sheep, and Nellis Air Force Bombing Range). At a minimum, the EA should demonstrate that DOE considered the possibility of shortening the distance traveled, avoid more cities, and its rationale for ruling those options out.

5. The INEEL CAB recommends the addition of analysis related to potential shipments of all DOE-managed waste that could be disposed at NTS.

We are curious about the lack of analysis of transportation impacts related to shipments from Hanford and from INEEL to the NTS. We were also puzzled by a stated conclusion that intermodal transport from INEEL would be more expensive than truck transport from INEEL given the lack of supporting documentation. We believe the EA should consider all LLW that could be destined for disposal at the NTS as a result of the pending LLW Record of Decision (ROD) for LLW disposition.

We note that DOE is also considering NTS for complex-wide disposal of mixed LLW (MLLW) as well. It seems pointless to restrict the analysis to only one waste stream that could be disposed at NTS unless no other waste streams are appropriate for intermodal transport. We recommend that the analysis in the EA be supplemented to ensure consistency with DOE's overall management for all waste streams. The EA should assess all impacts associated with all planned shipments of waste destined for NTS (based on the latest volume estimates). The expanded analysis would forestall the need to prepare additional NEPA documentation in the future.

6. The INEEL CAB recommends that all conclusions presented in the EA be confirmed and substantiated.

Some of the conclusions presented in the EA appear to be unsubstantiated. One example is a conclusion that 24-hour operations of an intermodal facility in downtown Caliente would have no impact on the residents of Caliente. We encourage DOE to make sure all conclusions are well documented and based on sound analysis.

7. The INEEL CAB recommends that DOE consider routing empty trucks along the same routes used for loaded trucks.

The analysis suggests that the primary impacts associated with transportation of LLW to NTS are not related to the fact that LLW is radioactive but rather to increased traffic. As a result, we questioned the rationale for routing empty trucks through the Las Vegas metropolitan area (presented on page 22). We feel that a decision to route both full trucks and empty trucks along designated routes could serve to minimize the traffic impacts of LLW disposal at NTS.