INEEL Oversight
Idaho's eyes on the INEEL

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September 21, 2000

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Mr. David L. Meyer
Chief, Rules and Directives Branch
Division of Freedom of Information and Publications Services
Office of Administration
Mailstop T-6D-59
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Re: *Draft Environmental Impact Statement for the Construction and Operation of an Independent Spent Fuel Storage Installation on the Reservation of the Skull Valley Band of Goshute Indians and the Related Transportation Facility in Tooele County, Utah*, NUREG-1714, June 2000.

Dear Mr. Meyer:

The State of Idaho has the following comments on the above-referenced Draft EIS:

Because the proposed facility evaluated in this EIS would be located in the State of Utah, the primary focus of the State of Idaho's review of the EIS has been on the analysis of transportation impacts of the proposed action (Section 5, especially Section 5.7, and Appendices C and D). Routes from the generating stations of the eight member utilities to the facility in Utah would probably not pass through Idaho. However, routes from other generating stations, specifically the Trojan plant in Oregon and the Columbia Generating Station (formerly WPPSS 2) in Washington would, as noted in Section C.3.5, likely pass through Idaho.

There are 359 metric tons of heavy metal (MTHM) of spent nuclear fuel (SNF) at the Trojan plant, which ceased operation in 1992. There will be 581 MTHM at Columbia (projected through 2011) or 1167 MTHM (projected through 2046) (information from Appendix A 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*, DOE/EIS-0250D, July 1999; referenced hereinafter as the Geologic Repository DEIS). Thus, if both of these facilities ship SNF to the proposed facility, on the order of 100 casks of SNF might be shipped through Idaho.

Impacts of SNF transportation to the proposed facility were estimated in the subject EIS by modeling the impact as if all of 40,000 MTHM of SNF were to be shipped by rail from the

ADM03

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Maine Yankee generating station in Maine. This evaluation is characterized as bounding the impact of shipment from multiple sites because the Maine Yankee station is the farthest from the proposed facility. We question the adequacy and the bounding nature of this analysis for the following reasons:

1. In addition to human health impacts, shipment of approximately 4000 casks of SNF (up to 100 through Idaho) to the proposed facility will have an impact on state, regional, and local government agencies that will likely be called on to assist in public information activities and will be required to plan for and possibly respond to transportation emergencies. This impact on government resources does not appear to be addressed in the subject EIS. This impact can be considerable, especially in small rural counties such as many of those in Idaho.

2. The assumption of 100 percent rail shipment is questionable, and is probably not bounding. Section 2.1.3.2.3 of the Geologic Repository DEIS describes a "mostly rail shipping scenario" in which about 80 percent of commercial SNF is shipped by rail and 20 percent by truck, because some commercial nuclear sites lack the capability of loading large-capacity rail shipping casks. Both infrastructure and human health impacts from truck shipment would be different than from rail since highways are often closer to populated areas than rail lines.

3. Comparison of some of the transportation analysis results in the subject EIS to those in Section 6.2 and Appendix J of the Geologic Repository DEIS suggests that the analysis in the subject EIS may not be bounding. The following table summarizes some of the analysis results for radiological impacts presented in the two EIS's.

	PFSF DEIS (40,000 MTHM)	**Geologic Repository DEIS (mostly-rail scenario, 70,000 MTHM)**
Incident-free person-rem		
Public	184	3300-5000 (880-2600, rail portion)
Worker	24.4	1900-2300 (1100-1500, rail portion)
Probability-weighted accident person-rem	84.6	42-47

Even if the results in the Geologic Repository DEIS are scaled appropriately for differences in quantity of SNF and distance, the incident-free population doses, especially the worker doses, remain higher than those in the subject EIS. Based on this cursory review, it is suggested that a careful comparison of the analyses presented in these two EIS's be conducted and the reason for the different results be identified.

In addition to the above discussion of transportation impact assessment, we submit the following miscellaneous comments:

1. Page lxvii, left column, bottom box and page lxviii, third column

   A worker dose of 4.45 rem per year seems unusually high, and a dose of 5.3 rem per year is above the legal limit. Would these doses not be limited by the application of ALARA principles or facility administrative limits to significantly less than 5 rem?

2. Page 4-47, line 37

   The statement that "canister leakage under hypothetical accident conditions is not considered to be a credible event" should be justified, or an accident scenario, for example an aircraft crash into a stored cask, that could result in an environmental release should be analyzed.

3. Page C-7, line 28

   The header for Section C.3.5 should be "Route to Skull Valley from Pocatello, Idaho," NOT "...from Black Rock, Utah."

4. Page D-4, line 36

   "0.13 Sv/h" should be "0.13mSv/h." In other words, 13 mrem is equal to 0.13 mSv, and 13 mrem/h is the appropriate dose rate at 1 m from the shipping cask.

If you have any questions or concerns, please call Jerry Downs, Environmental Scientist, INEEL Oversight Program at (208) 528-2600.

Sincerely,

Kathleen Trever

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KT/nrh

cc. Scott C. Flanders via fax (301)415-8555
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