



Private Fuel Storage, L.L.C.

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**DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
COMMITMENT RESOLUTION LETTER #2
DOCKET NO. 72-22 / TAC NO. L22462
PRIVATE FUEL STORAGE FACILITY
PRIVATE FUEL STORAGE L.L.C.**

Reference: October 25, 2000 public meeting in Salt Lake City, Utah between Private Fuel Storage, NRC, BLM, BIA, and the STB concerning cultural resource issues along the proposed Low Corridor rail line

During the above referenced meeting Private Fuel Storage (PFS) was asked to consider three issues associated with the construction of the railroad line in the Skunk Ridge area. The issues are as follows:

1. PFS has proposed using an existing "jeep" road on the south side and adjacent to the mainline on the Union Pacific (UP) right of way as an access route to the mainline tie-in point and start of the new PFS railroad line. This road appears to be an access road utilized by UP personnel. PFS should confirm that this proposed route for construction access does not disturb any cultural resource sites identified in the Class III Cultural Resource Inventory prepared by P-III Associates, Inc. dated September 2000.
2. If the proposed route adjacent to the mainline railroad proves to be encumbered with cultural resource issues, PFS should assess the feasibility of utilizing the frontage road from Delle, UT as a possible alternate access route to Skunk Ridge.
3. To access the proposed starting point of the new PFS railroad line as discussed in Issue 1, construction traffic will be required to cross the mainline right of way. PFS has proposed using the existing remnants of the now abandoned US 40 under the mainline Rail Bridge as a means of crossing the mainline right of way. Once south of the mainline right of way, construction traffic would be routed along the existing "jeep" road adjacent to the mainline as previously discussed. PFS should assess the

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feasibility of a temporary, at-grade rail crossing in the vicinity of the US 40 Rail Bridge.

To respond to Issue 1, all sites identified in the aforementioned Cultural Resource Inventory have been placed on the attached figures SK-900A and B. The location of these sites was then verified by field inspection performed by PFS, Stone & Webster, and P-III personnel. Figure SK-900A provides an overview of the entire area of concern while SK-900B shows a more detailed view of the proposed construction access route under the US Route 40 RR bridge then turning NE onto the existing access road which runs along the Union Pacific right-of-way. Two turning radii have been annotated on the figures, one at 60 feet and one at 100 feet. In addition, field measurements were taken of the Railroad Bridge and found to be 15 feet 6 inches high by 24 feet wide clear opening (the aforementioned culture resource report erroneously reported a clear height of approximately 17 feet).

As shown on figure SK-900B, construction equipment will be able to pass under the US Route 40 RR bridge and make the turn onto the existing access road which runs along the Union Pacific right-of-way without disturbing the undisturbed portions of the Old Victory Highway, New Victory Highway, or additional portions of US Route 40 roadbed. PFS maintains its initial position that there are no cultural resource impacts related to the question of construction access to the rail corridor other than a short portion of the existing US 40 roadbed under the rail bridge. PFS maintains its position that covering the pavement during the construction time-frame with suitable materials is an appropriate mitigation for the potential damage to the road bed remnant crossing the mainline right of way under the rail bridge. It was observed by PFS that the previous installation of the four fiber optic cables running along the southern side of the mainline railroad has damaged approximately 10 - 12 feet of US 40 roadbed immediately adjacent to the Railroad Bridge in the approximate alignment of the UP "jeep" road.

Even though PFS maintains its present position on construction access with respect to Issue 1, a drive through was conducted on the frontage road from Delle, UT to Skunk Ridge to capture some understanding of the feasibility of its use as an alternative in response to Issue 2. The frontage road leaving Delle is composed of approximately 1.6 miles of improved "jeep" road and an additional 5.1 miles of "2-track" jeep road to the Skunk Ridge area. The 2-track road would certainly require some improvement to be used by PFS as an access corridor especially during inclement weather. The initial 1.6 miles could likely be used with minimum improvement.

In response to Issue 3, PFS re-reviewed the field conditions concerning the feasibility of a temporary at-grade mainline crossing. PFS confirmed its belief, as stated in the October 25, 2000 meeting, that a temporary at-grade crossing introduces unwarranted new safety issues to the construction scenario. There are two possible at grade crossing locations near the Railroad Bridge, both of which are impacting the mainline at a point of

super-elevation of the track rails (one higher than the other) on a curve. PFS was unsuccessful in receiving direct UP input on this issue but believe at a minimum UP would not favor a track crossing at this point or would prohibit it outright. Irrespective of the ultimate UP position, PFS does not believe this concept provides any improvement over the PFS position established in response to Issue 1. PFS believes this option is neither feasible nor prudent.

In summary, PFS believes the proposed route utilizing the existing "jeep" road adjacent to the UP mainline provides the safest and most economical construction access to the Low siding area while maintaining the integrity of the sites identified in the Cultural Resource Inventory. If you have any questions regarding this matter, please contact me at 303-741-7009.

Sincerely,



John L. Donnell
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Attachments

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