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Private Fuel Storage, L.L.C.

P.O. Box C4010, La Crosse, WI 54602-4010
Phone 303-741-7009 Fax: 303-741-7806
John L. Donnell, P.E., Project Director

March 8, 1999

Mr. Glenn Carpenter, District Manager
Bureau of Land Management
2370 South 2300 West
Salt Lake City, UT 84119

Dear Mr. Carpenter,

APPLICATION FOR TRANSPORTATION ON FEDERAL LANDS
PRIVATE FUEL STORAGE FACILITY
PRIVATE FUEL STORAGE L.L.C.

References: 1) PFS Letter, Parkyn to Carpenter, Transmittal of Application for Transportation on Federal Lands, dated August 28, 1998

Please find enclosed the amended right-of-way application for utilization of BLM managed public lands for the Private Fuel Storage Facility (PFSF) Intermodal Transfer Point (4-769986). This application was originally submitted on August 28, 1998 (Reference 1). It has been noted that the Legal location of Township was inadvertently shown incorrectly as 1N. The amended Application shows the correct location as Township 1S.

If you have any questions, please contact me at 303-741-7009.

NF06

John Donnell
Project Director, PFS

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Copy to: Mr. Leon Bear, Skull Valley Band of Goshute Indians
Mr. Mark Delligatti, NRC
Mr. Jay Silberg, Shaw Pittman
Mr. John Donnell, PFSLLC
Ms. Denise Chancellor, State of Utah
Mr. David Allison, BIA
Ms. Patricia Winmill, Parsons Behle
Ms. Margaret Swimmer, Hall Estill
Mr. John Parkyn, PFSLLC

STANDARD FORM 299 (10/95)
Prescribed by DOI/USDA/DOT
P.L. 96-487 and Federal
Register Notice 5-22-95

APPLICATION FOR TRANSPORTATION AND UTILITY SYSTEMS AND FACILITIES ON FEDERAL LANDS

FORM APPROVED
OMB NO. 1004-0060
Expires: August 31,1998

FOR AGENCY USE ONLY

NOTE: Before completing and filing the application, the applicant should completely review this package and schedule a preapplication meeting with representatives of the agency responsible for processing the application. Each agency may have specific and unique requirements to be met in preparing and processing the application. Many times, with the help of the agency representative, the application can be completed at the preapplication meeting.

Application Number

Date Filed

1. Name and address of applicant *(include zip code)*

Private Fuel Storage L.L.C.
PO Box C4010
La Crosse, WI 54602-4010

2. Name, title, and address of authorized agent if different from item 1 *(include zip code)*

John Donnell, Project Director
PO Box 5406
Denver, CO 80217-5406

3. TELEPHONE *(area code)*
303-741-7009

Applicant Private Fuel Storage L.L.C.

Authorized Agent

4. As applicant are you? *(check one)*
   a. ____ Individual
   b. ____ Corporation*
   c. ____ Partnership/Association*
   d. ____ State Government/State Agency
   e. ____ Local Government
   f. ____ Federal Agency
   g. ✓ Limited Liability Corporation

* *If checked, complete supplement page*

5. Specify what application is for: *(check one)*
   a. ✓ New authorization
   b. ____ Renewing existing authorization No.
   c. ____ Amend existing authorization No.
   d. ____ Assign existing authorization No.
   e. ____ Existing use for which no authorization has been received *
   f. ____ Other*

* *If checked, provide details under item 7*

6. If an individual, or partnership are you a citizen(s) of the United States? ____ Yes ____ No

7. Project description (describe in detail): (a) Type of system or facility, *(e.g., canal, pipeline, road)*; (b) related structures and facilities; (c) physical specifications *(Length, width, grading, etc.)*; (d) term of years needed: (e) time of year of use or operation; (f) Volume or amount of product to be transported; (g) duration and timing of construction, and (h) temporary work areas needed for construction *(Attach additional sheets, if additional space is needed.)*

(a) The right of way (ROW) will be used to construct an intermodal transfer point (ITP) next to the Union Pacific mainline 1.8 miles West of Timpie, Utah, on a parcel of ground within the N½ SE ¼ SE ¼ of Section 12, T.1S., R.8W., SLBM, which is public land administered by the BLM. See attached Figure 2.1-1 drawings 0599601-EY-09 & 0599602-EY-14. The ITP is discussed in more detail in the Environmental Report (ER) at Section 3.2.1.4, "INTERMODAL TRANSFER POINT/SKULL VALLEY ROAD."

(b) The ITP will be use as part of the transportation of spent commercial nuclear fuel to the Private Fuel Storage Facility (PFSF), a temporary spent fuel storage site. The sealed transportation casks will be transferred from rail cars to trucks at the ITP for further shipment to the PFSF via Skull Valley Road. See description of the PFSF in ER Sec. 3.2.1.2, "STORAGE FACILITY."

(c) The ROW is approximately 9 acres of flat land located between the Union Pacific mainline and the I-80 frontage road (2 acres of Union Pacific land will also be used). The facilities will include one metal building (80 ft by 200 ft) and a 30 ft wide by 500 ft long access road connecting the ITP to an existing frontage road. The ITP also includes rail sidings, which are on Union Pacific right of way. See ER Sec. 3.2.1.4, "INTERMODAL TRANSFER POINT/SKULL VALLEY ROAD."

(d) Term of use expected to be 50 years.

(e) During the initial years of operation until the storage facility reaches its capacity of 4000 stored canisters, it is expected that between 100 to 200 shipments of transportation casks will be shipped to the site each year, resulting in two rail shipments on average per week being transferred to trucks at the ITP throughout the year. At the end of the storage facility's life, the 4000 canisters will be shipped from the site to the Department of Energy. See details in ER Section 3.3, "FACILITY OPERATION."

(f) Each rail shipment consists of 1 – 3 transportation casks to be transferred to trucks. See ER Sec. 1.2. "NEED FOR THE FACILITY," for a more detailed discussion of the anticipated shipment volumes.

(g) Construction of the ITP is scheduled to begin at the beginning of 2001 and last about 1 year. See ER Sec. 1.3, "PROPOSED PROJECT SCHEDULE."

(h) All work will be performed within the request ROW boundaries and Union Pacific land.

8. Attach a map covering the area and show location of project proposal See attached Figure 2.1-1 and drawings 0599601-EY-09 and 0599602-EY-14

9. State or Local government approval: ____ Attached ____ Applied for ✓ Not Required

(Continued next page)

10. Nonreturnable application fee: ____ Attached ____ Not required

11. Does project cross international boundary or affected international waterways? ____ Yes ✓ No *(if "yes," indicate on map)*

12. Give statement of your technical and financial capability to construct, operate, maintain, and terminate system for which authorization is being requested

The PFSLLC has the technical and financial capability to construct, operate, maintain, and terminate the ITP.

Technical Capability

PFSLLC personnel have experience with the design, construction, and operation of rail and truck facilities and spent fuel handling associated with Nuclear Generating Plants and spent fuel storage facilities. The ITP will be operated in accordance with all applicable NRC and DOT requirements. Chapter 9 of the PFSF Safety Analysis Report (SAR) provides a discussion of Technical Qualifications of the PFSF staff to design, construct, and operate the PFSF and related facilities.

Financial Capability

A financing plan has been developed that ensures the PFSLLC has reasonable assurance of obtaining the necessary funds to construct, operate and decommission the PFSF. See details of the financial capabilities in the LA, Sec. 1.6, "FINACIAL QUALIFICATIONS" and Sec. 1.7, "DECOMMISSIONING FUNDING ASSURANCE."

13a. Describe other reasonable alternative routes and modes considered.

Two modes of transporting the casks from the Union Pacific mainline to the PFSF are being pursued. Under the ITP alternative addressed in this application, the casks would be transferred from rail car to truck trailer at the ITP and transported to the PFSF via the Skull Valley Road using trucks However, the preferred approach is by direct rail from the mainline to the PFSF via a proposed new rail spur. The spur alternative is discussed in ER Sec. 3.2.1.5, "LOW CORRIDOR RAIL SPUR."

b. Why were these alternatives not selected?

Both alternatives are viable. The ITP provides an additional mode of transportation to the PFSF. The rail spur is the preferred mode of transportation to the PFSF because it involves less handling of the casks and is therefore more efficient and timely in comparison to the highway. In addition, while there is little traffic on the Skull Valley road, the large tractor/trailers needed to haul the casks will create some level of traffic interference, which will be avoided using the rail spur.

c. Give explanation as to why it is necessary to cross Federal Lands.

The ITP must be located north of the I-80 Interstate Highway in the vicinity of the intersection of the Skull Valley Road and the Union Pacific mainline. The combination of private industry in the area, the interstate right of way, the Great Salt Lake, topographical obstacles, bird refuges, and wetland areas limit the number of viable locations on which the ITP can be constructed. The federal lands located between the Union Pacific mainline and the I-80 frontage road are public lands administered by the BLM. Access from the mianline to the frontage road would be required to cross BLM administered lands.

14. List authorizations and pending applications filed for similar projects which may provide information to the authorizing agency. *(Specify number, date, code, or name)*

NRC License Application for the PFSF Independent Spent Fuel Storage Installation (ISFSI)(Docket No. 72-22, dated 6/20/97)

15. Provide statement of need for project, including the economic feasibility and items such as: (a) cost of proposal (construction, operation, and maintenance); (b) estimated cost of next best alternative; and (c) expected public benefits.

The Nuclear Waste Policy Act of 1982, mandated that by 1998, the Department of Energy (DOE) provide permanent disposal sites for spent nuclear fuel from the nation's commercial nuclear power plants. However, the DOE has not met its 1998 deadline and will not be able to provide permanent storage until at least 2010. As a result, utilities have been forced to provide interim storage for their spent fuel beyond 1998. The PFSF allows storage for those plants, which may be unable to increase their own storage space or where increased on-site storage might be economically disadvantageous. The PFSF may be the only alternative to the premature shutdown of a power plant resulting in the loss of electrical power to the public. It also allows nuclear power plants that are permanently shutdown to remove all the spent fuel from the site and decommission. Construction of the ITP is an integral part of the PFSF project. The need for the PFSF is described in ER Sections 1-1, "BACKGROUND," and 1-2, "NEED FOR THE FACILITY."

(a) The cost of the proposed ITP is estimated at $10 million. See ER Sec. 7.3, "COSTS," for a detailed discussion of the costs of the PFSF.

(b) Capital cost of the proposed rail spur is estimated at $25 million.

(c) The proposed ITP is necessary in order to transfer the spent fuel shipping casks from rail car to trucks for further transportation to the PFSF for interim storage and, at the end of such storage, for transferring the spent fuel shipping casks from truck to rail cars for further transportation on the railroad mainline to a permanent storage site. The direct benefit of the PFSF is the continued generation of electric power by the subscribing nuclear power plants. The benefits to the Skull Valley Band of Goshute Indians are steady revenue for the Tribal Government and Band members, jobs for tribal members, increased business at their convenience store during construction and operation, and the potential for new economic development due to the improved transportation access to the reservation. The benefits for Tooele County are cask surcharges, increase in regional employment due to the facility construction and operation, and procurement of materials and supplies for the facility. See ER Sec. 7.2, "BENEFITS," for a discussion of benefits.

(Continued on next page)

16. Describe probable effects on the population in the area, including the social and economic aspects, and the rural lifestyles.

The proposed ITP is located on previously disturbed public land administered by the BLM that is currently not in use. No relocation of residential, commercial, or industrial structures is anticipated under this alternative. There are no wetlands or other environmentally sensitive areas near the ITP and access road. Demographic impacts will be minimal. See ER Sec. 4.3.1, "EFFECTS ON GEOGRAPHY, LAND USE, AND DEMOGRAPHY," for details.

Minor short-term employment will result from construction activities associated with the ITP. These activities will utilize a small local labor force commuting daily to the project area and will not require relocation. Therefore it is anticipated that no adverse impacts on socioeconomic resources will result from these activities. Operationally, the infrequent transport of casks along Skull Valley Road will have no adverse socioeconomic impacts. See ER Sec. 4.3.6, "EFFECTS ON SOCIOECONOMIC RESOURCES," for details.

17. Describe likely environmental effects that the proposed project will have on: (a) air quality; (b) visual impact; (c) surface and ground water quality and quantity; (d) the control or structural change on any stream or other body of water; (e) existing noise levels; and (f) the surface of the land, including vegetation, permafrost, soil, and soil stability.

(a) There will be minor air quality impacts resulting from construction of the ITP consisting of fugitive dust and diesel emissions. Similarly, the effects on air quality from cask transport between the ITP and the PFSF will be minor and will consist mainly of diesel emissions from the heavy haul trucks that will make 3-5 round trips per week. Impacts to residences is insignificant. See ER Sec. 4.3.3, "EFFECTS ON AIR QUALITY," for more details.

(b) There will not be any significant impacts to the scenic environment. The existing area primarily consists of disturbed and developed areas (i.e., UP mainline and I-80 Interstate highway, and nearby industrial plants. See ER Sec. 4.3.8, "EFFECTS ON REGIONAL HISTORICAL, CULTURAL, SCENIC, AND NATURAL FEATURES," for more details.

(c) There are no existing surface water bodies near the ITP. Utilizing the ITP frontage road to accommodate heavy haul vehicles is judged to have no additional impact on the existing hydrological resources along the road right-of-way. See ER Sec. 4.3.4, "EFFECTS ON HYDROLOGICAL RESOURCES," for details.

(d) There are no existing surface water bodies near the ITP. The ITP will be designed with gentle slopes to control runoff and erosion. See ER Sec. 4.3.4, "EFFECTS ON HYDROLOGICAL RESOURCES," for details.

(e) It is expected that 3-5 round trips per week will be required for the heavy haul transportation of casks from the ITP. The heavy haul tractor/trailer will travel at approximately 20 mph resulting in a sound level, 50 feet from the frontage road, of 85 dBA. This is similar to a conventional tractor-trailer at normal highway speeds, however, the duration of the noise will be longer due to the slower speed. Due to the infrequency of these trips and because of the undeveloped nature of the frontage road and Skull Valley Road, no significant noise impacts are anticipated from this minor increase in sound levels. See ER Sec. 4.3.7, "EFFECTS OF NOISE AND TRAFFIC," for details.

(f) About 11 acres of land (9 acres of public land and 2 acres of Union Pacific) will be disturbed at the ITP for the building, access road, and rail sidings. In general, the small amount of vegetation lost will be a minor impact as much of this land is composed of common habitat types, such as desert shrub/saltbush. See ER Sec. 4.3.2, "EFFECTS ON ECOLOGICAL RESOURCES," for details.

18. Describe the probable effects that the proposed project will have on (a) populations of fish, plantlife, wildlife, and marine life, including threatened and endangered species; and (b) marine mammals, including hunting, capturing, collecting, or killing these animals.

(a) Since the proposed ITP is at a previously disturbed site and is surrounded by developed features, effects to wildlife will be minimal. See ER Sec. 4.3.2, "EFFECTS ON ECOLOGICAL RESOURCES," for details.

(b) Due to the location, no effects to marine mammals will occur.

19. State whether any hazardous material, as defined in this paragraph, will be used, produced, transported or stored on or within the right-of-way or any of the right-of-way facilities, or used in the construction, operation, maintenance or termination of the right-of-way or any of its facilities. "Hazardous material" means any substance, pollutant or contaminant that is listed as hazardous under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. 9601 et seq., and its regulations. The definition of hazardous substances under CERCLA includes any "hazardous waste" as defined in the Resource Conservation and Recovery Act of 1976 (RCRA), as amended, 42 U.S.C. 6901 et seq., and its regulations. The term hazardous materials also includes any nuclear or byproduct material as defined by the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2011 et seq. The term does not include petroleum, including crude oil or any fraction thereof that is not otherwise specifically listed or designated as a hazardous substance under CERCLA Section 101(14), 42 U.S.C. 9601(14), nor does the term include natural gas.

Spent commercial nuclear reactor fuel will be transported within the ITP right-of-way. The spent fuel is safely packaged in shipping casks licensed by the NRC under 10 CFR 71, "Packaging and Transportation of Radioactive Material," transported in accordance with 49 CFR 173, "Shippers General Requirements for Shipments and Packages" and 49 CFR 174, "Carriage by Rail," and physically protected in accordance with 10 CFR 73, "Physical Protection of Plants and Materials."

(Continued on next page)

20. Name all the Department(s)/Agency(ies) where this application is being filed.

Department of Interior / Bureau of Land Management

I HEREBY CERTIFY. That I am of legal age and authorized to do business in the State and that I have personally examined the information contained in the application and believe that the information submitted is correct to the best of my knowledge.

Signature of Applicant	Date
John L. Sewell Agt J. PARKYN	3/8/99

Title 18, U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious, or fraudulent statements or representations as to any matter within its jurisdiction

PRELIMINARY PLAN OF DEVELOPMENT
Right of Way Application U-76985
Private Fuel Storage L.L.C. - Rail Line

The following is a preliminary Plan of Development ("POD") for the construction of a rail line along proposed right of way U-76985 (the "ROW"). The preliminary POD is being submitted in advance of the completion of certain surveys, analyses and designs that are necessary to finalize the POD, in order to apprise BLM of the general outline of Private Fuel Storage (PFS) proposed rail line POD. PFS will incorporate additional information as it becomes available in subsequent revisions to the POD. In addition, other matters discussed below may be refined, amended or expanded upon in subsequent POD revisions.

1. PURPOSE AND NEED FOR THE FACILITY

1.1 The Facility. ROW U-76985 will be used to construct a single track, railroad line from the Union Pacific mainline at Low, Utah to the Skull Valley Indian Reservation across public lands administered by the BLM.

1.2 Purpose. The rail line will be used to transport sealed shipping casks of spent nuclear fuel to the Private Fuel Storage Facility (the "Storage Facility"), a temporary spent commercial nuclear fuel storage facility proposed to be located on the Skull Valley Indian Reservation. The nuclear power industry's critical need for a temporary spent fuel storage facility is described in detail in the ROW Application at paragraph 15 and in the Environmental Report (the "ER"), submitted as part of the Nuclear Regulatory Commission's (the "NRC") licensing process, a copy of which has been provided to the BLM, at Sections 1.1, "Background," and 1.2, "Need For The Facility." The design and use of the Storage Facility is described in the ER, in Chapter 3, "The Facility."

1.3 Need for the ROW. Because most of the land in Skull Valley is public land administered by the BLM, it is necessary to use public land in order to provide rail access between the Union Pacific mainline and the Storage Facility located on the reservation.

2. DESIGN CRITERIA

2.1 ROW Location. Figure 2.1-1 and drawings 0599602-EY-10, 11, 12, & 13, attached to the ROW application, depict the general route of the proposed ROW. In general, the rail line will traverse Range R9W between Township T1N and T5S. Environmental surveys have been conducted within a ½ mile corridor along the general route depicted in the drawings. Future aerial surveys and constructability analyses will be conducted to narrow the corridor to the final alignment profile. When the surveys and analyses are complete, the POD will be revised to reflect a more definitive description of the route.

2.2 Right-Of-Way Size. The ROW is approximately 32 miles long and is 200 feet wide.

2.3 Width Of Rail Bed. The rail bed will be 40 feet wide, with the remaining portion of the ROW used, as necessary, for cut and fills, which will be revegetated as described in Section 5.11.3. The rail bed will be composed of the standard 4' 8 ½" gauge railroad track, 17 ft wide layer of ballast material, 34 ft wide layer of sub ballast material, and 3 ft wide cleared area each side of the sub ballast.

2.4 Siding. A siding connecting the proposed rail line to the Union Pacific mainline will be constructed near Low, Utah. The siding will consist of 3 siding tracks spaced 20 feet apart. The total length of the siding will be approximately 6000 feet. The mainline is slightly depressed in this area such that the siding will require some excavation to connect the new line to the existing mainline.

2.5 Maximum Grade Of Rail Bed. Considering the ballast and sub ballast, the top of the rail will typically be approximately 4' 6" above the surrounding terrain.

2.6 Ballast. The ballast and sub ballast will be composed of crushed gravel or rock, in conformance with applicable railroad standards, and obtained from an existing commercial gravel pit in the area.

2.7 Rail and Tie Specifications. The rail will be a minimum of 115 lb. AREA type rail. Compromise splice plates will be used where necessary to maintain compatibility with the mainline rails. Ties will be standard mainline type wood rail ties, 7 in by 9 in. by 8'-6" long. The ties will be supplied with a preservative to prevent deterioration and anti-splitting devises at each end of the tie.

2.8 Cut/Fill Slope Ratios. Except for the area near the Low siding, which will require some excavation, the rail alignment crosses relatively flat terrain, and accordingly, relatively few cuts and fills will be necessary. When the preliminary design work for the rail line is completed, PFS will amend the POD to include the cut and fill ratios, the locations of the necessary cuts and fills and other pertinent details.

2.9 Culverts and Bridges . The rail line will cross approximately 56 dry arroyos. It is anticipated that small, medium, or large culverts or short bridge crossings will be necessary at each arroyo. When the preliminary design work for the rail line is completed, PFS will amend the POD to identify the location of the necessary culverts.

2.10 Road Crossings. The rail line crosses approximately 7 dirt roads or four wheel drive trails and 2 improved or graveled roads. At grade crossings will be

constructed so as not to impair travel on the roads. When the surveys are completed, PFS will amend the POD to identify the location of each of these crossings. Because the roads are rarely traveled, the terrain is flat, and PFS's trains will, be infrequent and travel at approximately 20 miles per hour, safety concerns do not require installation of safety devices such as lights or barriers.

2.11 Fences. The rail line will not be fenced, which will limit the potential effects on wildlife and grazing resources in the area. Because of the low speeds and infrequency of the trains and the visibility offered by the flat terrain along the rail corridor, safety concerns do not require fencing.

2.12 Access. PFS does not propose to construct an access road along the rail line in order to avoid impacts to the area that might otherwise arise from the public's use of such a road to access the interior of Skull Valley. As described below in Section 6, neither maintenance requirements nor fire concerns require construction of an access road.

2.13 Design Drawings. When environmental and aerial surveys, constructability analyses and preliminary design of the rail line are complete, PFS will amend the POD to include appropriate design drawings, including the following:

- Centerline Survey Plat.
- Plan And Profile Sheets.
- Typical Rail Bed Cross-Sections.
- Typical Crossing Details.
- Typical Culvert/Bridge Details.
- Typical Cut and Fill Diagrams.

3. GOVERNMENTAL AGENCY INVOLVEMENT

Construction of the rail line may require several state permits including a stream alteration permit under Utah Code Ann. § 73-3-29 and a general storm water construction permit under Utah Code Ann. § 19-5-107. Details of these permits are discussed in Chapter 9 of the ER.

4. RESOURCE VALUES AND ENVIRONMENTAL CONCERNS

4.1 Compatibility With Land Use Plans. Because the rail line is not located in an existing BLM transportation corridor, an amendment to the Pony Express Resource Management Plan may be necessary.

4.2 Impact on Resource Values.

4.2.1 Air Quality. The overall impacts on air quality from construction and operation will be minor and limited to the general vicinity of the corridor. Any impacts will mainly be associated with emissions of fugitive dust from construction activities and from locomotive emissions during cask transport operations. No long-term impacts on the local meteorology/climatology will result from these activities. See ER Sections 2.4.2.5 "Air Quality" and 4.4.3 "Effects on Air Quality."

4.2.2 Noise. Since the distance between the proposed rail line and residences along Skull Valley Road is 5 to 10 miles, construction and operation noise is not expected to be very audible. Sound level predictions for the locomotive and rail cars delivering casks to the site indicate that the maximum noise levels would be 31 dBA at Skull Valley Road, 26 dBA near Eight Mile Spring Road, and 19 dBA at the intersection of I-80 and Skull Valley Road. These levels are low and will have a minimal impact on valley residences and mountain wilderness study areas. See ER Sections 2.8 "Noise and Traffic" and 4.4.7 "Effects of Noise and Traffic."

4.2.3 Geologic Hazards. The rail line passes through relatively flat terrain or in areas where there are no prominent geological formations. It is anticipated that geological hazards will not be an issue. The geological characteristics of the surrounding area is described in ER Section 2.6 "Geology and Seismology."

4.2.4 Mineral and Energy Resources. No mineral resources have been identified along the rail line corridor. Therefore, no impact to this resource is expected from the construction of a rail line. See ER Section 4.4.5 "Effects on Mineral Resources."

4.2.5 Paleontological Resources and Cultural Resources. Prior to construction of the rail line, a Class III cultural resource survey will be performed in the area potentially affected by the rail line to identify paleontological or cultural resources that could exist on the ROW. Based on a Class I cultural resource inventory for the rail line conducted in 1998 that included a one mile wide study area centered over the proposed rail line,

there is only a low probability of encountering archeological or historical sites. There is the potential for impacts to historic trails that may cross the rail line. The National Park Service is currently preparing a Comprehensive Management Plan (CMP) for Historic Trails. The rail line will be reviewed for consistency with the CMP, how the rail line would fit into the limits of acceptable change for the trails, and implement any mitigation measures as needed. See ER Sections 2.9.1 "Cultural Resources" and 4.4.8 "Effects on Regional Historical, Cultural, Scenic, and Natural Features."

4.2.6 Soil Resources. Cut and fills will be balanced to minimize the need for additional fill materials. Additional fill material from areas beyond the ROW is not expected. Topsoil for areas excavated will be obtained from stockpiles of topsoil that was excavated along rail bed and cut and fill areas.

4.2.7 Water Resources. There are no existing surface water bodies in the rail line corridor. Ground water is over 100 ft below the surface. Therefore it is not expected that the rail line will have any impact on water resources. See ER Sections 2.3.3.3 "Ecological Resources Along Low Corridor -- Aquatic Resources"; 2.5 "Hydrology" and 4.4.4 "Effects on Hydrological Resources."

4.2.8 Vegetation Resources. Construction of the rail line will temporary disturb approximately 776 acres of BLM-managed land of which 155 acres will be disturbed for the life of the PFSF. Clearing activities will temporarily remove greasewood and desert shrub/saltbrush. However, only land within the 40-foot wide rail line corridor (155 acres) will be permanently cleared while approximately 621 acres will be revegetated after construction. This small amount of vegetation is minor compared to the over 1 million acres of desert shrub/saltbrush within Tooele County. There are also no unique vegetation habitat features in areas proposed for vegetation removal. See ER Sections 2.3.3.1 "Ecological Resources Along Low Corridor -- Vegetation" and 4.4.2 "Effects on Ecological Resources."

4.2.9 Wildlife Resources. The level of impact to the local population of wildlife from construction and operation is expected to be minimal. Construction activities will temporarily disturb resident wildlife along the rail line. Larger mammals will temporarily avoid the construction area, but likely return following the completion of construction. The rail line has the potential of interrupting wildlife travel across the rail line briefly during construction but will have little effect once in operation since it will not be fenced. See ER Sections 2.3.3.2 "Wildlife" and 4.4.2 "Effects on Ecological Resources."

4.2.10 Threatened and Endangered Species Resources. Ecological surveys indicate that there are no threatened and endangered species located within the rail line corridor, except for transient, infrequent occurrences by Bald Eagles and Peregrine Falcons. These should not be adversely affected by construction activities, since the construction activities are temporary. See ER Section 2.3.3.4 "Threatened and Endangered Species."

4.2.11 Visual Resources. Due to the low profile of the rail line, the rail line will not be obviously visible from most locations in the valley. The rail line will be apparent near I-80 and from high elevations in the Cedar Mountains. The visual change will be similar with other developments in the area, such as I-80, the RR mainline, and Skull Valley Road. Because of low recreational use of the area, the impact is not expected to be significant. See ER Sections 2.9.2 "Visual and Scenic Resources" and 4.4.8 "Effects on Regional Historical, Cultural, Scenic and Natural Features."

4.2.12 BLM Improvements. None known.

4.2.13 Recreation and Wilderness Resources. Impacts to the limited recreational uses in the area are discussed in the ER at Sections 2.2.2 "Land Use" and 4.4.1, "Effects on Geography, Land Use, and Demography." The ROW alignment is not located within any wilderness area, wilderness study area or any governmental wilderness proposal. The BLM's Wilderness Reinventory, released February 4, 1999, concluded that the nearby Cedar Mountains Wilderness Study Area (the "WSA") has wilderness characteristics and that six additional Inventory Units adjacent to the WSA enhance the wilderness values of the WSA. The eastern boundaries of two of these units, Units 2 and 3, are located between approximately 1.25 to 2.5 miles west of the proposed ROW corridor. The proposed rail line is located approximately 3.5 miles east of the closest WSA boundary. The rail line, like the Skull Valley Road, 1-80 and other manmade features in the Skull Valley, will likely be visible from some vantage points within the Cedar Mountain WSA and Inventory Units, as well as from certain vantage points in the Deseret Peak Wilderness Area and the Stansbury Mountain WSA located in the Stansbury Mountains adjacent to the eastern side of the valley. Construction of the rail line is consistent with BLM's visual modification standard VRM IV established for the area, which allows activities resulting in major modifications to the existing landscape, which may dominate the view and be a major focal point for the viewer. It is also possible that engine noise may be audible from certain locations within some of the WSAs or Inventory Units. The noise and visual impacts of the rail line are discussed generally in the ER at Sections 2.9.2, 4.4.7 "Effects of Noise and Traffic" and 4.4.8 "Effects on Regional Historical, Cultural, Scenic, and Natural Features".

4.2.14 Socioeconomic Concerns. No adverse impacts on socioeconomic resources are anticipated. Minor short-term employment will result from construction activities associated with the rail line. These activities will utilize a local labor force commuting daily to the project area and will therefore not induce relocation of families and associated impacts on local government services. See ER Sections 2.2 "Geography, Land Use, and Demography" and 2.7 "Socioeconomics."

4.2.15 Environmental Justice. The environmental justice issues associated with PFS's proposed Storage Site are discussed in the ER at Section 2.7.3. "Environmental Justice." The rail ROW will not pose environmental justice issues beyond those associated with the Storage Site itself, except that construction and operation of the rail line will contribute to the additional employment opportunities discussed in ER Section 2.7.3.

4.2.16 Flood Plains. The ROW corridor is not located within a flood plain. See ER Section 2.5.2. "Floods."

4.2.17 Proximity to Hazardous Waste Sites. Low is located approximately 7 miles east of the Aptus hazardous waste incinerator, the nearest hazardous waste site. Other hazardous waste sites are the Envirocare Mixed Waste and Low-level Radioactive Waste Landfill (15 miles) and the Grassey mountain hazardous Waste Storage Facility (16 miles). There are no known hazardous waste sites in the vicinity of the rail corridor.

4.2.18 Grazing. The rail line crosses the Eightmile and Black Knoll Pastures which are part of the Skull Valley grazing allotment. Construction activities related to the rail line will temporarily disturb resident livestock and cause them to avoid the construction area. Operation of the rail line is not expected to adversely affect livestock grazing since the ROW will not be fenced and livestock will be able to freely cross the rail line accessing rangeland on either side. Due to the infrequent number of railroad trips (1-2 round trips/week) and the slow train speed (20 mph), collisions with livestock are not anticipated. See ER Sections 2.2.2 "Land Use" and 4.4.1, "Effects on Geography, Land Use and Demography."

5. CONSTRUCTION

5.1 Construction Schedule. Construction of the line is scheduled to begin in the fall of 2000 and last about 14 months.

5.2 Temporary Use Permit. A temporary use area of 100 feet, 50 feet on each side of the 200 foot wide permanent ROW, will be needed for topsoil stockpiles and other construction uses. Those areas of the temporary use area used for soil stockpiles will be cleared of vegetation. Use of these additional areas will be needed during the 14-month construction period.

5.3 Access to and Along ROW During Construction. Access to the ROW will be from the established roads in Skull Valley and along the rail corridor itself.

5.4 Equipment Requirements. Construction of the rail line will require the use of several pieces of heavy equipment including scrappers, bulldozers, front end loaders, dump trucks, graders, compactors, rail layers, etc. When construction details are finalized, PFS will amend the POD to provide equipment requirements.

5.5 Work Force Requirements. See ER Tables 4.1-1, "Estimated Construction Labor Force Phase 1 Activities," for a list of construction workers expected to construct the PFSF. Construction of the rail line will likely require a General Superintendent, Equipment Operators, General Laborers, and a Construction Engineer. When construction detail are finalized, PFS will amend the POD to provide a detailed work force list.

5.6 Flagging and Staking. Prior to construction, a survey crew will stake the rail centerline, the boundaries of the 200-foot ROW, and the temporary use areas.

5.7 Clearing and Grading of the Right-of-Way.

5.7.1 Vegetation Clearance. Clearing will consist of the removal and disposal of vegetation along the 40 foot wide rail bed, at cut and fill areas, and soil stockpile areas within designated stockpile areas of the temporary use areas.

5.7.2 Topsoil Saving And Stockpiles. Where topsoil exists, the original ground surface will be excavated along a 10 foot wide strip of land along the rail bed and at cut and fill areas to a depth of approximately 6 inches and the topsoil will be stockpiled. Stockpiles will be used for final surfacing to support vegetation growth. Stockpiles slopes will be maintained in a stable condition.

5.7.3 Disposal Of Woody Vegetation. Woody vegetation will be shredded and scattered in place.

5.8 Earthwork

5.8.1 Cut And Fill Areas. Cuts and fills of the existing grade will be made to establish the new rail profile grade by mechanical means i.e., scrappers,

bulldozers, graders, etc. Explosive charges will not be used unless required for the soil conditions.

5.8.2 Borrow Material and Ballast Sources. Fill material for cuts will be obtained from nearby cuts. The project will balanced cut and fills in order to minimize the need for additional fill material. Ballast will be obtained outside of the ROW from an existing commercial gravel pit in the area.

5.8.3 Preparation of Railroad Bed. The railroad sub bed will be proof-rolled and backfilled with one foot of compacted fill material (excavated or imported). A minimum of 12 inches of sub-ballast will be placed on the prepared surface.

5.8.4 Soil Erosion And Water Pollution Control Measures. Erosion and water pollution control measures will include minimizing vegetation removal, construction of silt fencing and hay bales to stabilize slopes, temporary ditches and berms to divert stormwater away from existing drainages, maintenance of soil stockpiles, and limiting the areas of construction activities.

5.8.5 Disposal Of Unuseable Excavated Materials. Since the cut and fills will be balanced, it is expected that the quantities of unuseable excavated materials will be nonexistent or minimal. Specific plans for disposal of any excess excavated material have not been determined at this time.

5.9 Rail Installation. The ties and rail will be laid on top of the ballast and a rail construction machine will travel along the previously laid rail and install the remaining six inches of crushed gravel or rock ballast beneath and around the wooden ties. The construction machine will also attach the rails to the ties using spikes and tie plates. The rail will be spliced with bolted joint plates for ease of assembly.

5.10 Construction Procedures. When design of the rail line is completed, PFS will amend the POD to include a construction plan addressing the following issues:

- Contingency Planning.
- Dust Abatement.
- Traffic Control Plan for Road Crossings.
- Safety Plan for Employees and Contractors.
- Waste Disposal.
- Fire Prevention and Suppression Plan.

5.11 Stabilization, Rehabilitation and Revegetation.

5.11.1 Recontouring. After construction, all unoccupied disturbed areas will be graded to a stable contour that will support adequate surface water drainage patterns in the area.

5.11.2 Erosion Control Structures. Permanent erosion control measures will be maintained through the use of riprap and geotextile fabrics at culvert exits to prevent soil scouring and revegetating of cleared and excavated areas. When the design of specific erosion control structures is completed, PFS will amend the POD to identify the location and design of the structures.

5.11.3 Soil Replacement. Topsoil will be spread uniformly at approximately 2 inches thick on exposed cut and fill surfaces. Topsoil will consist of previously excavated stockpiled material.

5.11.4 Seeding Specifications. Seeding will be placed on topsoil by hydroseeding. Seeding will consist of mixing and applying an indigenous grass seed mixture, commercial fertilizer and stabilizing emulsion, or any combination thereof, with fiber and water. The indigenous grass seed mixture will consist of a proportional blend of the predominate grasses in the area. Only areas where grasses existed prior to excavation will be seeded.

6. OPERATION AND MAINTENANCE OF THE RAIL LINE

6.1 Level of use. During the initial years of operation until the Storage Facility reaches its capacity of 4000 stored canisters, it is expected that between 100 to 200 transportation casks will be shipped to the site each year resulting in one to two round trips being made on average each week. At the end of the Storage Facility's life (no more than 40 years), the 4000 canisters will be shipped from the site, over an indeterminate period of time, to a permanent storage facility. See details in ER Section 3.3, "Facility Operation." Each rail shipment will consist of 3 – 6 transportation casks. The largest train is expected to consist of two 1,500 horsepower locomotives with six cars containing casks, seven empty buffer cars, and one security car. The maximum speed of the train is expected to be 20 miles an hour. See ER Section 1.2, "Need For The Facility," for a more detailed discussion of the anticipated shipment volumes.

6.2 Access. PFS will use existing roads in the area and railroad vehicles along the track to access various portions of the rail line for maintenance purposes.

6.3 Inspection and Maintenance Requirements. Regular inspections and maintenance will be performed on the rail line as part of the PFS operations.

Inspection and maintenance activities will be performed to ensure against rail damage, missing or loose bolts on rail joint plates, loose spikes, tie deterioration and settlement, ballast placement, and improper drainage.

6.3.1 Snow removal. Snow removal will not normally be conducted on the rail line.

6.3.2 Noxious Weed Control. Chemical herbicide will be used to control noxious weeds to keep the 40 foot wide rail corridor clear of vegetation and to control noxious weeds on newly seeded areas until grasses are established.

6.4 Fire Prevention and Suppression Plan. PFS will be using spark arrestors on engine stacks and special truck bearings that are designed to eliminate sparks that are typically associated with railroads. The 34 feet of ballast and clearing the 40-foot right of way of vegetation will further reduce the potential for fires. In addition, should a fire occur, because the rail spur will be constructed close to grade and crossings will be constructed approximately every mile, emergency fire vehicles will have access along the rail bed. Accordingly, the rail line will not significantly increase fire hazards in the area. No additional fire suppression is believed to be necessary.

6.5 Safety Plan. A Safety Analysis Report (SAR) addresses the operation and maintenance of the spent nuclear fuel casks. The SAR is required as part of the Nuclear Regulatory licensing process. A copy of the SAR can be accessed from the NRC or at the public access reading room at the Tooele County Library or University of Utah Library.

6.6 Public Access to ROW. Because the rail line will not be fenced, the public will have access to the ROW.

7. TERMINATION AND RESTORATION

7.1 Removal of facilities. At the end of the PFSF life, the rail, ballast, culverts and bridges will be removed from the area.

7.2 Reclamation of disturbed areas. After the rail and ballast are removed, the portions of the ROW affected by rail and ballast will be recontoured to stable contours that support natural drainage conditions. Disturbed areas will be revegetated as described above in paragraphs 5.11.4.

PRELIMINARY PLAN OF DEVELOPMENT
Right of Way Application U-76986
Private Fuel Storage L.L.C. - Intermodal Transfer Point

The following is a preliminary Plan of Development ("POD") for the construction of an intermodal transfer point (the "ITP") on right of way U-76986 (the "ROW") . The preliminary POD is being submitted in advance of the completion of certain surveys, analyses and designs that are necessary to finalize the POD, in order to apprise BLM of the general outline of Private Fuel Storage (PFS) proposed ITP. PFS will incorporate additional information as it becomes available in subsequent revisions to the POD. In addition, other matters discussed below may be refined, amended or expanded upon in subsequent POD revisions.

1. PURPOSE AND NEED FOR THE FACILITY.

1.1 The Facility. ROW U-76986 will be used to construct an intermodal transfer point (the "ITP") next to the Union Pacific mainline 1.8 miles West of the intersection of Interstate Highway 80 ("I-80") and the Skull Valley Road, at Timpie, Utah.

1.2 Purpose. The ITP will be used as part of the transportation of spent nuclear fuel to the PFS Storage Facility (the "Storage Facility"), a temporary spent commercial nuclear fuel storage facility proposed to be located on the Skull Valley Indian Reservation. At the ITP, sealed shipping casks of spent fuel will be transferred from rail cars to trucks for further shipment along the adjacent frontage road and Skull Valley Road to the Storage Facility. The nuclear power industry's critical need for a temporary spent fuel storage facility is described in detail in the ROW Application at paragraph 15 and in the Environmental Report (the "ER"), a copy of which has been provided to the BLM, at Sections 1.1, "Background," and 1.2, "Need For The Facility." The design and use of the Storage Facility is described in the the ER, at Chapter 3, "The Facility."

1.3 Need for the ROW. The ITP must be located adjacent to the Union Pacific railroad mainline, north of I-80, and near the Timpie underpass where the Skull Valley Road passes under I-80. The ITP must also be near the frontage road, which leads to the Skull Valley road. The combination of private industry in the area, I-80, the Great Salt Lake, topographical obstacles, wildlife refuges and wetlands limits the number of viable locations on which the ITP can be constructed. The most suitable land in the area for the ITP facility is public land administered by the BLM.

2. DESIGN CRITERIA

2.1 ROW Location. Figure 2.1-1 and drawings 0599601-EY-9-B, and -0599602-EY-14-A, attached to the ROW application, depict the location of the proposed

ROW. The ITP is located on a parcel of ground within the N1/2 of the SE1/4 of the SE1/4 of Section 12, Township T1S, Range R8W.

2.2 Right-Of-Way Size. The ROW parcel is approximately 1000 feet long by 350 feet wide with an access road right-of-way of approximately 400 feet by 100 feet wide long. The parcel contains approximately 9 acres of land. The total area of the ITP is approximately 11 acres, which includes land on the Union Pacific right-of-way.

2.3 Structures and Facilities. The ITP facilities will include one building, which will house a gantry crane used to transfer the transportation casks from rail cars to truck trailers, a short rail siding and a road that will loop around the perimeter of the ROW parcel and connect the ITP to the nearby frontage road (the "Loop and Access Road"). Portions of the road and building will be located on the adjacent Union Pacific right of way. The rail siding will be located entirely on Union Pacific's right of way. The ITP site will be illuminated by high pressure sodium yard lights.

2.4 Building Materials. The building housing the gantry crane will be a pre-engineered metal building, 80 feet by 200 feet.

2.5 Loop and Access Road. The road will be 30 feet wide and have an asphalt surface.

2.6 Fences. The ITP site will be surrounded by an 8 foot high chain link fence.

2.7 Services. Potable water will be provided in tanks transported to the ROW site. Sewage facilities will be provided by a septic system and drain field.

2.8 Design Drawings. When environmental and aerial surveys, constructability analyses and preliminary design of the ITP are complete, PFS will submit to the BLM appropriate design drawings, including a site plan, building floor plan, typical cross section for the Loop and Access Roadroad.

3. GOVERNMENTAL AGENCY INVOLVEMENT.

Construction of the ITP may require several state permits, including a general storm water construction permit under Utah Code Ann. § 19-5-107. Details of the permit requirements are discussed in Chapter 9 of the ER.

4. RESOURCE VALUES AND ENVIRONMENTAL CONCERNS

4.1 Compatibility With Land Use Plans. The ITP facility appears to be compatible with BLM's Resource Management Plan.

4.2 Impact on Resource Values.

4.2.1 Air Quality. There will be minor air quality impacts resulting from construction of the ITP consisting of fugitive dust and diesel emissions. Effects on air quality from operation of the ITP will consist of diesel emissions from the heavy haul trucks that will make 2-4 round trips per week. Impacts to residences will be insignificant. See ER Sections 2.4.2.5 "Air Quality" and 4.3.3 "Effects on Air Quality."

4.2.2 Noise. It is expected that 2-4 round trips per week will be required for the heavy haul transportation of casks from the ITP. The heavy haul tractor/trailer will travel at approximately 20 mph resulting in a sound level, 50 feet from the frontage road, of 85 dBA. This is similar to a conventional tractor-trailer at normal highway speeds, however, the duration of the noise will be longer due to the slower speed. Due to the infrequency of these trips and because of the undeveloped nature of the frontage road, no significant noise impacts are anticipated from this minor increase in sound levels. See ER Sections 2.8 "Noise and Traffic" and 4.3.7 "Effects of Noise and Traffic."

4.2.3 Geologic Hazards. Given the geologic characteristics of the area and the minimal nature of the structures to be constructed on the ITP, it is not anticipated that geologic hazards will be an issue. The geologic characteristics of the surrounding area is described in ER Section 2.6 "Geology and Seismology."

4.2.4 Mineral and Energy Resources. No mineral resources have been identified at the ITP site. See ER Section 4.3.5 "Effects on Mineral Resources."

4.2.5 Paleontological Resources and Cultural Resources. Prior to construction of the ITP, a Class III cultural survey of the site will be conducted to identify paleontological or cultural resources located on the site. Based on a Class I survey of the site, none is expected to be found. See ER Sections 2.9.1 "Cultural Resources" and 4.3.8 "Effects on Regional Historical, Cultural, Scenic, and Natural Features."

4.2.6 Soil Resources. About 11 acres of land will be disturbed at the ITP for the building, Loop and Access Road, and rail sidings. Approximately nine acres of BLM land will be disturbed, with the other two acres being within the Union Pacific right of way.

4.2.7 Water Resources. There are no existing surface water bodies near the ITP. The ITP will be designed with gentle slopes to control runoff and erosion. Utilizing the ITP frontage road to accommodate heavy haul vehicles

is judged to have no additional impact on the existing hydrological resources along the road right-of-way. See ER Sections 2.3.2.3 "Aquatic Resources" and 4.3.4 "Effects on Hydrological Resources."

4.2.8 Vegetation Resources. Construction of the ITP will disturb approximately nine acres of BLM land and two acres of non-BLM land. The small amount of vegetation lost will be a minor impact as much of this land is composed of common habitat types, such as desert shrub/saltbush. (Ref. ER Sec. 4.3.2). See ER Sections 2.3.3.1 "Vegetation" and 4.3.2 "Effects on Ecological Resources."

4.2.9 Wildlife Resources. Because the ITP will be located at a previously disturbed site and is surrounded by I-80 and the Union Pacific mainline and other developed features, effects to wildlife will be minimal. Mitigation measures will be developed in consultation with the Utah Department of Wildlife Resources ("UDWR") to ensure that no further adverse affects will result from project activities at the site. For more details and a discussion of the impact on wildlife resources of PFS's use of the Skull Valley Road for heavy haul transportation, see ER Sections 2.3.2.2 "Wildlife" and 4.3.2 "Effects on Ecological Resources."

4.2.10 Threatened and Endangered Species Resources. Peregrine falcons and occasional transient bald eagles are the only federally or state listed endangered or threatened species occurring within the vicinity of the ITP and the Skull Valley Road transportation corridor. Prior to construction, mitigation measures will be developed in consultation with UDWR and the United States Fish and Wildlife Service to ensure there are no adverse impacts to these species arising out of the construction of the ITP. See ER Sections 2.3.3.4 "Threatened and Endangered Species" and 4.3.2 "Effects on Ecological Resources."

4.2.11 Visual Resources. There will not be any significant impacts to the scenic environment. The surrounding area primarily consists of disturbed and developed areas (i.e., Union Pacific mainline and I-80 Interstate highway, and nearby salt plants) See ER Sections 2.9.2 "Visual and Scenic Resources" and 4.3.8 "Effects on Regional Historical, Cultural, Scenic and Natural Features."

4.2.12 BLM Improvements. None known.

4.2.13 Recreation and Wilderness Resources. The ITP site is not located within or near any wilderness areas, wilderness study areas or any areas proposed for wilderness. Given the location of the ITP site between a major freeway and a railroad mainline, the site has very low recreational value and

the construction of the ITP facility is not expected to adversely affect recreational opportunities in the area.

4.2.14 Socioeconomic Concerns. Minor short term employment will result from construction of the ITP. These activities will utilize a small local labor force commuting daily to the project area and will not require relocation. It is anticipated that no adverse impacts on socioeconomic resources will result from these activities. The infrequent number of trips along Skull Valley Road will have no adverse socioeconomic impacts. See ER Sections 2.7, "Socioeconomics," and 4.3.6, "Effects on Socioeconomic Resources."

4.2.15 Environmental Justice. The environmental justice issues associated with PFS's proposed Storage Site are discussed in the ER at Section 2.7.3. "Environmental Justice." The ITP ROW will not pose environmental justice issues beyond those associated with the Storage Site itself, except that construction and operation of the ITP will contribute to the additional employment opportunities discussed in ER Section 2.7.3.

4.2.16 Flood Plains. The ITP is located within an elevated area that shows no signs of periodic flooding. There are lower elevation areas on both sides of the site that are mudflat areas. The ITP will be built within the upland area and connect to the frontage road without affecting the nearby mudflat areas. See ER Section 2.5.2. "Floods."

4.2.17 Proximity to Hazardous Waste Sites. The ITP is located approximately 16 miles east of the Aptus hazardous waste incinerator, the nearest hazardous waste site. Other hazardous waste sites are the Envirocare Mixed Waste and Low-level Radioactive Waste Landfill (24 miles) and the Grassey mountain hazardous Waste Storage Facility (28 miles). There are no hazardous waste sites in the vicinity of the ITP

4.2.18 Grazing . The ITP is located on a narrow disturbed developed area between the Union Pacific mainline and I-80 and is not used for grazing.

5. CONSTRUCTION

5.1 Construction Schedule. Construction of the ITP is schedules to begin in January of 2001 and last less than a year.

5.2 Access to and Along ROW During Construction. Access to the ROW will be from the adjacent frontage road.

5.3 Construction Equipment Requirements Construction of the ITP will require the use of several pieces of heavy equipment including scrappers, bulldozers, front end loaders, dump trucks, graders, compactors, rail layers, etc. When construction

details are finalized, PFS will amend the POD to provide the specific equipment requirements.

5.4 Work Force Requirements See ER Tables 4.1-1, "Estimated Construction Labor Force Phase 1 Activities," for a list of construction workers expected to construct the PFSF. Construction of the ITP will likely require a crew consisting of a General Superintendent, Equipment Operators, General Laborers, and a Construction Engineer. When construction details are finalized, PFS will amend the POD to provide a detailed work force list.

5.6 Flagging and Staking. Prior to construction, a survey crew will stake the boundaries of ROW.

5.7 Clearing and Grading of the ROW.

5.7.1 Vegetation Clearance. Clearing will consist of the removal and disposal of vegetation within the ROW.

5.7.2 Topsoil Saving And Stockpiles. The area within the ITP is sparsely vegetated. Topsoil in the areas that will be disturbed will not be stockpiled since these areas will consist of the building, parking areas, or the loop roadway and will not be revegetated. Native vegetation will be left on the areas that will not be disturbed, such as around and in the center of the loop road.

5.7.3 Disposal Of Woody Vegetation. Woody vegetation, if any, will be shredded and scattered in place.

5.8 Earthwork

5.8.1 Grading. Areas of the ITP site that will consist of the building, rail siding, or loop road will be graded to establish the required profile by means of scrappers and graders. No explosive charges will be required.

5.8.2 Borrow Material. No requirements for borrow material is expected for the ITP.

5.8.3 Loop and Access Road Bed. Construction of the loop and access road bed will consist of proof-rolling compacting the in-situ material for the subgrade, laying a minimum of 12 inches of aggregate base course, and laying an 8 inch layer of bituminous pavement.

5.8.4 Soil Erosion And Water Pollution Control Measures. Erosion and water pollution control measures will include construction of silt fencing and

hay bales to stabilize slopes, maintaining existing drainages, and limiting the areas of construction activities.

5.9 Construction Procedures. When design of the ITP is completed, PFS will draft and submit to the BLM a construction plan addressing the following issues:

- Contingency Planning.
- Dust Abatement.
- Traffic Control Plan.
- Safety Plan for Employees and Contractors.
- Waste Disposal.
- Fire Prevention and Suppression Plan.

5.10 Stabilization, Rehabilitation and Revegetation. After construction, all unoccupied disturbed areas will be contoured to maintain existing drainages and surfaced with gravel.

6. OPERATION AND MAINTENANCE OF THE ITP

6.1 Level of use. During the initial years of operation until the Storage Facility reaches its capacity of 4000 stored canisters, it is expected that between 100 to 200 transportation casks will be shipped to the site each year resulting in 2 to 4 truck round trips being made on average each week. At the end of the Storage Facility's life (no more than 40 years), the 4000 canisters will be shipped from the site, over an indeterminate period of time, to a permanent storage facility. See details in ER Section 3.3, "Facility Operation."

6.2 Access. Access to the ITP will consist of an access road to the interstate frontage road within the ROW.

6.3 Inspection and Maintenance requirements. Regular inspections and maintenance will be performed at the ITP as part of the PFS operations. Inspection and maintenance activities will be performed to ensure all equipment and roadways are maintained in a safe and operable condition.

6.3.1 Snow removal. Snow removal may be required on the loop and access road to maintain access to the ITP. Excess snow will be moved and piled on unoccupied areas within the site.

6.3.2 Noxious Weed Control. Chemical herbicides will be used to control noxious weeds in the areas disturbed by the ITP construction.

6.4 Fire Prevention and Suppression Plan. Fire prevention and suppression in the building will be maintained by fire extinguishers. Areas outdoors near structures will be cleared of vegetation to prevent any possible range fires from encroaching the ITP.

6.5 Safety Plan. A Safety Analysis Report (SAR) addresses the operation and maintenance of the spent nuclear fuel casks. The SAR is required as part of the Nuclear Regulatory licensing process. A copy of the SAR can be accessed from the NRC or at the public access reading room at the Tooele County Library or University of Utah Library

6.6 Public Access to ROW. The ITP will be fenced such that there will be no public access to the site.

7. TERMINATION AND RESTORATION

7.1 Removal of facilities. At the end of the PFSF life, the ITP structures will be removed from the area

7.2 Reclamation of disturbed areas. After the ITP structures are removed, the disturbed areas will be revegetated as described above in paragraphs 5.11.4.