

NUCLEAR REGULATORY COMMISSION

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167th Meeting

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UNITED STATES NUCLEAR REGULATORY COMMISSION'S
ADVISORY COMMITTEE ON NUCLEAR WASTE

January 11, 2006

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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ADVISORY COMMITTEE ON NUCLEAR WASTE

167TH MEETING

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WEDNESDAY, JANUARY 11, 2006

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The meeting came to order at 9:30 a.m. in room
T2B3 of Two White Flint North, Rockville, MD. Michael
T. Ryan, Chairman, presiding.

PRESENT:

MICHAEL T. RYAN	CHAIRMAN
ALLEN G. CROFF	VICE CHAIRMAN
JAMES H. CLARKE	MEMBER
WILLIAM J. HINZE	MEMBER
RUTH F. WEINER	MEMBER

ALSO PRESENT:

MICHAEL SCOTT	DESIGNATED FEDERAL OFFICIAL
ASHOK C. THADANI	DEPUTY EXECUTIVE DIRECTOR
LATIF HAMDAN	STAFF

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I-N-D-E-X

Opening Remarks by the ACNW Chairman

Chairman Ryan 3

Source Characterization (Spatial Analysis and Decision Assistance Code)

Mr. Powers

Use of Dedicated Trains for Transportation of High-Level Radioactive Waste and Spent Nuclear Fuel

Ms. Sampson

P-R-O-C-E-E-D-I-N-G-S

9:32 a.m.

CHAIRMAN RYAN: All right, if I could have your attention. Good morning, the meeting will come to order. This is the second day of the 167th meeting of the Advisory Committee on Nuclear Waste. My name is Michael Ryan, chairman of the committee. The other members of the committee present are Vice Chairman Allen Croff, Ruth Weiner, James Clarke and William Hinze.

During today's meeting the committee will (1) be briefed by the staff on the capabilities of Version 4.1 of the Spatial Analysis and Decision Assistance Bayesian Subsurface Analysis Code. We will hear presentations by and hold discussions with representatives from the Federal Railroad Administration on the use of dedicated trains for transportation of spent nuclear fuel and other high-level radioactive waste to the proposed Yucca Mountain Repository. Three, we will brief the Commission on recent and planned activities. This briefing will take place at a different location in the Commission Briefing Room in 1 White Flint North. That will commence at 2 o'clock, and the schedule is from 2:00 to 4:00, for those that are interested. We will

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1 discuss proposed committee letters and reports.

2 Mike Scott is the designated federal
3 official for today's session. This meeting is being
4 conducted in accordance with the provisions of the
5 Federal Advisory Committee Act. We have received no
6 written comments or requests for time to make oral
7 statements from members of the public regarding
8 today's sessions. Should anyone wish to address the
9 committee please make your wishes known to one of the
10 committee staff. It is requested that speakers use
11 one of the microphones, identify themselves and speak
12 with sufficient clarity and volume so they can be
13 readily heard. It is also requested that if you have
14 cell phones or pagers that you kindly turn them off at
15 this time. Thank you very much.

16 Without further delay I will turn over.
17 The two next presentations will be led by Dr. Weiner.
18 Dr. Weiner?

19 MEMBER WEINER: Thank you. I'd like to
20 welcome George Powers from the Office of Research to
21 talk about the Spatial Analysis and Decision
22 Assistance program that is being carried out by NRC
23 along with a number of other federal agencies.

24 MR. POWERS: Okay, thank you very much.
25 The last time I was here this program was just getting

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1 underway.

2 CHAIRMAN RYAN: Do you have a lapel mic
3 on?

4 MR. POWERS: Oh, I'm sorry. There, is
5 that? Okay.

6 CHAIRMAN RYAN: That's great.

7 MR. POWERS: I can hear myself more than
8 once. And it was started for several reasons, which
9 we'll get to in a few minutes. But anyway, the
10 primary purpose for getting into the involvement of
11 this particular development was to try to pull
12 together a more realistic and dependable estimate of
13 exposure and the parameters leading to determining
14 what that exposure is. And we elected to -- one of
15 the problems we've run into in the past are the number
16 of additional samples. There is an incredible amount
17 of effort out in the field wasted on bad sampling,
18 taken in the wrong place. So what we begin to do is
19 begin to optimize the sampling and the analysis that's
20 going to be involved.

21 Now, is it new? No. Argonne National
22 Laboratory is kind of where we got our start on this.
23 There's a guy up there by the name of Robert Johnson,
24 and he has used his version of it, which ran on a Unix
25 system, and that system is now just about dead. But

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1 the important point is is it's been applied at all of
2 these sites on a piecemeal basis. You can look at
3 your old slides on this one, but the only thing that
4 I think is really of importance here is the savings
5 that have occurred, like 40 - 80 percent sample
6 reductions, 30 percent, 50 percent. Costs going from
7 a \$40 million to an \$8 million cleanup effort. These
8 are worthy of taking note.

9 The NRC, we will be talking about one
10 particular little site that we're using as a test
11 site. It's called the Kiski site. It's a very small
12 little sample of data, but it was outstanding. We
13 found out that we could have reduced the number of
14 bore holes by 70 percent on that site, and at the same
15 time reduce the sampling by 85 percent to get the same
16 result. We'll go through that. We've got one we're
17 starting to play with now just a little bit in the
18 SADA framework, and that's Sequoyah Fuels. The
19 interesting thing about Sequoyah Fuels is it's had so
20 many holes poked into the ground that the underground
21 -- the groundwater patterns have changed due to the
22 holes.

23 We see the potential applications of SADA
24 beyond decommissioning-type activities in the area of
25 early site permits. A lot of sites are going to have

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1 to reevaluate where they're going to have to put down
2 wells up close, and there isn't any other code around
3 or any other techniques around that is going to be
4 capable of doing this without an incredible amount of
5 expense. It's going to also assist, I think, in the
6 operating license evaluations that are done, re-
7 licensing, and to some extent partial site release.

8 The big issue is to, when you get into
9 this, is to understand what the requirements are that
10 you are going to be having to apply. A lot of people
11 will go out and say 'Just bring me some more data and
12 we'll take a look at it.' Know why you're collecting
13 the data and what you're going to do with it. And at
14 the same time be sure that you have a feel for what
15 the uncertainties are, and how much uncertainty you
16 can stand. That led to this sequence that has started
17 here. In August 2000, a document came out by MARSSIM
18 that was a combination of DOE, EPA, NRC, the Air
19 Force, other parts of the Department of Defense, and
20 it began to tie together sampling uncertainties and so
21 forth based upon a two dimensional plane, going out,
22 taking surveys on land down to about 15 centimeters,
23 since that's where most of the dose modeling has been.
24 In that process, one of the things that you got into
25 was having to take a look at the instrumentation. How

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1 sensitive were you going to have to be to make
2 measurements, because the more sensitive your
3 instrument the fewer samples you could take. You
4 could go out with a Coke bottle if you wanted to and
5 throw it on the ground, see if it turned brown in the
6 morning. That takes too long if sensitivity isn't
7 there. And MARLAP took care of the instrumentation
8 side of it, and the laboratory side of it. And I
9 think this is probably one of the finest documents
10 that has been put together in a long, long time.

11 Currently they're working on the materials
12 part of it. They're calling it MARSAME, and they've
13 got it targeted for publication around 2007, sometime
14 in there. Talk to somebody else about that. We have
15 the subsurface one coming along. I am going to just
16 call it MARSSub since it's easy to remember,
17 subsurface. I prefer this one to BINMAR map, but
18 never mind. And then we're using SADA to begin to
19 answer some of these questions. We find that by the
20 time we turn it over to the multi-agencies for review
21 and so forth, if they have not been involved with the
22 development, that a little bit of time is taken. But
23 to review it, if you are familiar with the MARSSIM
24 process, and the EPA, things like data quality
25 objectives, knowing what you're going to do, why

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1 you're going to do it, what accuracy you're going to
2 need in like data quality assessment. You start out
3 with the DCGLs. You go through all of the modeling,
4 like you may run into with RESRAD, and you have
5 various components, survey units, release criteria.
6 I think that's probably relatively self-explanatory
7 for you.

8 An example that MARSSIM had, or came out
9 and had an impact. There was a document out there at
10 one time called 5849, which said go take a survey
11 point every five meters across the site that you are
12 working on. Here's some examples of what might have
13 happened. RESRAD, for an example, will take a 10,000
14 square foot area and model it. To do that, you would
15 require something like a thousand samples. Football
16 field, everybody can pretty well relate to that. That
17 would be here. And you would need about that many
18 samples to do, let's say, something like a football
19 field here, around a hundred samples to sample an
20 entire football field. What they didn't take into
21 account was the sensitivity of the instrumentation,
22 and how far away from your action guide that you were.
23 The further you were away from the action guide, and
24 the better your instrumentation was, a value called
25 delta over sigma, which is distance from the action

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1 point, and the variance of the samples you were taking
2 would get larger. And so you could get exactly the
3 same result. MARSSIM suggests to get around, a delta
4 over sigma of around three. Look, we're only taking
5 around 10 or 12 samples to get the same result with
6 the same confidence that you did when you were taking
7 a hundred. That paid off, and that has paid off on
8 several sites big time. There's -- I just covered
9 about an 8-hour lecture.

10 Sampling in the subsurface. When you get
11 down below the 15 centimeters, some things begin to
12 happen to you. Bingo, you lose the ability to scan.
13 You can no longer take a meter and walk over in the
14 way that we think about it with radiological things.
15 So we had to find a way to design the survey, make it
16 more efficient, and be sure that we didn't have any
17 hidden assumptions. By the way, through a few of
18 these I'll be just talking to the yellow points. I
19 assume you can read the other stuff.

20 So the research areas that we're involved
21 with right now is, a lot of it is dealing with
22 optimization. Time and effort, which eventually boils
23 down to cost. Want to improve the survey design.
24 We're using site knowledge now, which is leading us
25 into a Bayesian type of analysis. Take the

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1 information that you have now or in the past, and can
2 it be applied to what you are doing. Is there any
3 relationship between it and where the contamination
4 might be. In some cases yes and in some cases no.
5 Improved analysis. We're getting into geostatistics.
6 In the area of geostatistics, most of you are
7 familiar, or may have at least heard the term
8 variogram. What it is is a -- I'll show you one
9 later. We have the same thing occur subsurface. We
10 have, let's say an elevated volume. In MARSSIM we
11 were talking about the area, we had an elevated area.
12 They both kind of have the same relationship and
13 behavioral components. How are we going to get around
14 all this? We're going to start using more and more
15 surrogate data, and professional judgment. One of the
16 things that a lot of the licensees got very upset with
17 when MARSSIM started to come out is that their feet
18 were being held to the fire on a design for a survey,
19 and they didn't want to tie everything up on that one
20 particular survey. They said, well we'd like to go
21 out and look first. Well, the response was that's
22 what's going on during the time you're doing
23 characterization of a site. When you come to the
24 final status survey, we want to be able to go out
25 there and apply our statistics to it. So with taking

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1 things like Bayesian and some of this, a little bit of
2 this is going to be able to be relaxed just a little
3 bit, and we're going to be able to probably get better
4 results.

5 And reducing the number of samples is the
6 big issue. Once you get into subsurface, it really
7 gets out of control. Again, increase the information
8 that we're getting from historical data, other
9 geological data, and make more efficient use of the
10 hard data that you have. That's numerical data that
11 you can take and plug into a code. So I mentioned
12 that.

13 One thing that is important is not all
14 locations are going to be equally informative. When
15 you go out and you do a random survey, you're not
16 going to be getting the same information from those
17 spots. Even if you have secondary information, you're
18 going to have some areas where there may have been
19 things like oil spills that are going to affect. You
20 may have different geology. And that's where the
21 geostatistics and geophysical information can come in
22 and be used.

23 Okay, now we're going to run through SADA
24 in rather rapid fashion. It has all of this pretty
25 well built into it. We will touch on each one of

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1 these topics briefly, but it might be interesting to
2 note that it has been supported by both the DOE and
3 the EPA, and Version 3, which was about a year and a
4 half, two years ago, had 11,000 downloads worldwide.
5 Since January of 2005, when 4.1 was noticing to come
6 out, we've had around 4,000 downloads. Now, that
7 doesn't mean there's 4,000 people out there using it,
8 but this is people that have actually logged on, I've
9 got their email location, and date and time, and when
10 they downloaded it, so we know who, where, and believe
11 me it's worldwide. Side point: if you go to the
12 website of SADA, which I think most of you can find
13 relatively easily, go to the bottom of the homepage
14 and there's a little number off to the left. Click on
15 that number. It's a counter. It'll bring up such
16 things as where it's been downloaded to, how many hits
17 there have been on a site, from where in the world,
18 and it's really been quite useful and informative.

19 Okay. Graphics. This has increased quite
20 a bit. We can overlay GIS overlays now. And we're to
21 the point where it really doesn't matter where these
22 come from. They can come from AutoCAD, they can come
23 from any -- Earthvision, what's the other one,
24 Arcview. These are all can be moved back and forth.
25 In any event, your data, you can take a spatial data

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1 screen, look at your samples. You can pick out
2 samples with given compounds if you wish, or levels
3 that you're interested in. Survey units, this has
4 been a big thing in MARSSIM. You can draw polygons
5 around what you are going to make as your survey unit,
6 and you, at the time when we talked to you the first
7 time they were just getting started on this. We've
8 gotten to the point now of where polygons can be drawn
9 around all the survey units at once on your site and
10 you can do comparisons.

11 Visualization. This is what we had when
12 we talked to you the last time, and the camp that --
13 showing a transparency through a thing. We've now got
14 it to the point of where they can do all the neat
15 slice and dice and cube. One of the important things
16 with SADA is to present the data visually. That's its
17 primary function. Keep the math, the science inside
18 the machine, inside the process as accurate as you
19 possibly can, and present the data graphically. You
20 can get a lot of times much, much more information
21 from a graphic than you can.

22 Okay, statistics that is available within
23 it is overwhelming. There's univariate statistics
24 that pretty much anything from mean, standard
25 deviation, variances, a whole laundry list,

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1 histograms, all sorts of formations of data. You have
2 the ability to identify your analytes that you're
3 working with, detects the means, variances, pretty
4 much all that type of information. And for those of
5 you that have a little twinge into the EPA area, this
6 thing is tied to the CASS database. In fact, that's
7 where we're putting a lot of our stuff.

8 MARSSIM's in there now full blown. I'm
9 not going to go through this, but what it does is as
10 you go through MARSSIM, you are going to do things
11 like select your DCGL, come up with number of samples,
12 whether there's material and background and so forth,
13 and the key is that as you go through it, it's going
14 to tag whether you have completed all of that
15 particular protocol as needed. Did you pick the right
16 sensitivity of an instrument? If you didn't, it's
17 going to bounce you and you'll have a little red dot
18 out here. And it'll tell you exactly where to go to
19 fix it. The layout of the SADA code is very, very
20 much like your income tax program TurboTax. In fact,
21 if you go on and start to use it you'll see an
22 incredible similarity. The outline will come down in
23 the first block, you'll do it, it'll bring out the
24 information that you need, and keep it as you go on
25 through. If you forget something it'll let you know.

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1 This is just going through some of the
2 detail of MARSSIM. I don't think we really need to do
3 this. This is a sign test. You had 18 samples
4 required. They were using a Level 3. It bounds out
5 the so-called gray region that you're going to be
6 interested in. You're getting into, if you've got
7 stuff in background, where you've got it in your
8 sample and in your background, then you're going to go
9 to a Wilcoxon rank sum test, and in that case you're
10 going to have 18 survey units in your unit and in a
11 background area that you're going to do a comparison
12 on. So all the aspects are in there.

13 In the spatial analysis side of it, most
14 of you are familiar with things like contouring, where
15 you may have had a point here and a point, and you're
16 going to try and find some position in between that
17 you want to kind of draw an isodose curve. We do this
18 also, but a little more sophisticated, and with a
19 little bit more backup. I wish I could spend more
20 time on what's going on here. Is there anybody that
21 doesn't know what a variogram is? If not, see me.
22 I've got a little quickie thing. I've got a whole
23 presentation on variograms, it's about like that, but
24 what it is, there's a point down here that's called
25 the nugget. This is where your first point is. And

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1 immediately around that point there's a lot of
2 variability. So a lot of times this doesn't go
3 through the point. Then you have the range. This is
4 the range of where you have your variance. And then
5 you finally have a sill. That's the end of it. That
6 means that any information here, data that you have
7 here isn't going to influence this over here. Data
8 from here might influence that one from there, and
9 that's what's going on in between. The better
10 correlation you have, the slower the slope of the
11 curve, and the further you can look down. So when you
12 start looking at things like underground water
13 movement, or material running on the ground and
14 moving, you'll see a correlation. Let's say if there
15 had been a flow this way, these all kind of seem to be
16 related, and this'll turn out to be like this. If you
17 go the other way, boom, this thing's going to go up
18 and flatten out. And so we can put that into an
19 estimation of it. And from that we can reprocess and
20 come out and say, okay, where are the areas of
21 uncertainty. We know there's no problem here. We're
22 pretty sure we have material here, quite comfortable,
23 and this is the area that we're uncertain about. So
24 you start getting involved in determining the area.
25 This is kind of like the latest -- one of the later

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1 things that we just got into it. It's called a rose
2 diagram. What it is is a color version of a variogram
3 as you lay it down on a -- I don't know if anybody has
4 ever generated a variogram by hand, but it is
5 obnoxious. There is a lot of data that goes -- you
6 have to take every bloody point on that site and
7 process it, and then go to the next point and relate
8 it to all the rest of them. And this goes on and on.
9 And then that's usually in one direction. Here we've
10 just rotated the thing all the way around. Under the
11 -- so you have the processing, so you have a variogram
12 which is equivalent to let's say a line through here.
13 For example, here you have one that went up and
14 dropped off. That would be a point -- okay, I'm
15 sorry. As it goes on up higher, this is a bad fit.
16 You don't want that. You have more of a relationship
17 if the variance stays fairly low over a long distance.
18 Okay.

19 We've built into SADA since we saw you the
20 last time something over 21 sampling scenarios that
21 are now available. You have the basic ones that
22 everybody's familiar with, judgmentals, random, grids,
23 variations of grids. Depending on who you are, you
24 will select them. We have the MARSSIM design in there
25 obviously. But we get into the situation of when you

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1 get ready to re-sample, going back in, taking a look
2 at something. Then we have secondary sampling designs
3 where you may go to the area where there was the
4 highest variance, or you go to someplace like adaptive
5 fill. Hey, we had a random thing, but there's an area
6 in here we could take one more sample. It will
7 calculate the best place for you to do that. The high
8 value, and this goes on. Judgmental sampling. People
9 like to use this on occasion. It has some pros and
10 cons, but along the road is a real good example. A
11 MARSSIM sample across this might not be that
12 informative. Simple random. That's more like your
13 MARSSIM.

14 Okay. Life is good until you start going
15 down underneath into the ground, and you start wanting
16 to -- how are we going to talk about 3D? What I see
17 here, they call it 3D, I call it 2 1/2D. You've got
18 stuff on the surface that you take. Okay, that'd be
19 like MARSSIM. But now you're starting to go down, and
20 you start placing your point of your result of which
21 you're wanting all this whole area to be equivalent
22 to. This is where people start homogenizing cores.
23 And you can move it, and it'll assign values. I call
24 that 2 1/2D. You can, this is in place now. What
25 we're working on now is being able to take core scans.

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1 And when you start going into the third dimension, go
2 back and think about that variogram, and now start
3 putting it into the third dimension. That is going to
4 really be an effort. But we've got a real, real good
5 start on that. Searching for a hotspot. We have a
6 program out there called Elipgrid, which determines
7 how big of an area you're going to miss when you take
8 samples over a long period of time in a given area.
9 And we can now apply it to subsurface. We can put all
10 sorts of little shapes down there that are standard,
11 and look at what the probability is that you are going
12 to hit or miss it. And this is where things like
13 magnetometry, and some of these other concepts come
14 in, because they can really narrow some of this down
15 for you.

16 We can customize the criteria. You can
17 get data, bring it in from regions, states, locally,
18 and you can have all that data available to you, and
19 bring it in, and process it, and relating it to what
20 you're working on. There's a human health risk
21 calculation in here, complements of the EPA. See, EPA
22 funded this thing to the tune of, I don't know,
23 several million dollars before we got a hold of it.
24 And they've got all of this type of information in
25 here, and there's a couple of sets of that. There's

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1 one slide in cutting the presentation, making it a
2 little shorter. I had to cut one out that had kind of
3 a cute little picture. Okay.

4 So from that you can develop things like
5 health risk maps. Same thing on the radiological side
6 of it. Where the risk is going to be the highest you
7 can -- you have a site, you have areas where there's
8 contamination on it, you can determine what the risk
9 coefficient is going to be in various components on a
10 particular site. We had points that were identified
11 early on to take a look at.

12 And to decision analysis. This is the one
13 that I think is probably going to be used quite a bit.
14 You take the data, you have your various sampling
15 strategies laid out. From these you can get spatial
16 screens, and you can come up with risk based on space.
17 Areas of concern. This is going to be areas that you
18 might have to clean up. And we're working on
19 techniques of minimizing this area. We've got some in
20 there now that are quite good, but you can assign what
21 is it going to cost to haul out a cubic yard, or X
22 number of cubic yards of material. And we've got a
23 little risk curve here that will -- risk/benefit that
24 will tell you exactly what it's going to cost you to
25 clean that site up so you can use it in the estimation

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1 area.

2 Geobayesian modeling. Making use of soft
3 knowledge, soft information, and combining it with
4 hard data. And we fall into the area of geobayesian
5 modeling. Ordinary kriging and indicator kriging are
6 generally based on normal or log normal type
7 distributions. Indicator kriging is the one we're
8 finding more useful. We are having more and more luck
9 with the application of non-parametric statistics
10 because from our standpoint we really don't know what
11 the distributions are when you walk into a site, and
12 sometimes you never do. And we've found that through
13 MARSSIM, that any errors that are made by using a non-
14 parametric are usually almost unmeasurable. And
15 people talk about modeling.

16 Let's talk a little bit about the Kiski
17 site real quickly. This would be a prior knowledge
18 type curve or plot that you would make. In fact, you
19 actually sat down and said, there's X Y, and you drew
20 a line here, and you said okay, everything inside
21 here, we're pretty sure there's something there, and
22 90 percent sure there's something here, and I'm pretty
23 sure there's nothing out here. This particular range,
24 I really don't know whether there's anything there.
25 Now we're beginning to play some of the Bayesian game.

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1 So, there's where judgmental sampling would come in on
2 something like this. You've got these sampling plans
3 that you can use. But what happens is we're going to
4 go around, we're going to try and take a few samples
5 around this area of concern, some inside and some
6 outside, just for confirmation. This is what the
7 original data set looked like. The guys when they
8 started on this didn't have this information. I asked
9 them what they wanted, and we would provide them the
10 data, and we would pull it out of the data set and
11 give it to them. But, there were 1,261 samples in the
12 shallow sediment, and they took over 90 boreholes was
13 what had been done. And remember I said that we
14 reduced the number of samples by 85 percent, and the
15 number of boreholes by probably 70. And so this is
16 what it all kind of looked like. And this is looking
17 at it that way, and of course through the side. So
18 what we're going to be looking at as we go through
19 here is the analysis that's taking place at various
20 layers. Okay.

21 From the judgmental sample, what we did is
22 from that we went and said, okay, where is the closest
23 real data point of a real data value they could use.
24 We didn't want to go out and sample again. These red
25 points show above the action guide, the blue points

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1 below the action guide. This is on the surface. This
2 is down around six inches. A little bit deeper. The
3 red points are showing, again, above the action guide
4 and those below. There's 130 total samples taken.
5 And these were ran on each layer, and we came up with
6 the variogram prior correlation model that came up and
7 then began to drop off as you moved out at the end.
8 And here's kind of what happened. With zero samples,
9 yes, 0.6, 1.2 and 1.8 it looked like that. Did the
10 sample analysis with 130 samples, and here's what the
11 distribution looked like at the various levels. We
12 doubled the samples. Let's go to 260 samples and see
13 what kind of a change that would make. And a little,
14 but not very much. Probably, depending upon the cost
15 of the sample and where you'd want to do it. And then
16 with all 1,260 samples available. Now, by being a
17 little bit careful on where you took the samples and
18 how you did the analysis, we think we can probably get
19 by in this particular case with an evaluation of
20 probably around 130 samples. When you're looking at
21 the total impact there would be on, let's say material
22 that might be left behind.

23 These are the areas of concern that came
24 when we did the area of concern by looking at what
25 percent of the areas above a given value. And again,

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1 there's not that much change between 130 to 1,260.
2 There's a little larger area maybe, but not enough to
3 spend another couple of million dollars. The metrics
4 on this. This is the area of concern volume versus
5 sample, number of samples, and the volume that you
6 would let's say have to remove, which I was talking
7 about. In 130 samples, Y around 2,000. 260, yes it
8 went down some, and at 1,260 a little bit more. This
9 becomes a weigh, do I want to or don't I. We have a
10 percent change with the number of samples that we were
11 involved with. And finally, the thing that we would
12 be interested in, the percent that we would have
13 missed. And after 130 samples there, the 130 sample
14 things still look pretty good. Okay.

15 That brought up another interesting thing.
16 This is using a geobayesian analysis. What had
17 happened had you used something like your indicator
18 kriging, the everyday analysis that people use, might
19 use. This is the comparison between the two. The
20 question comes up, now remember, indicator kriging's
21 only going to use the data that's there. Either it's
22 there or it isn't. Bayesian's going to start, and
23 geobayesian's going to start making some assumptions
24 depending upon what you've told it. So it doesn't
25 drop off to a nice clean thing here. In this

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1 particular case I would have a tendency to recommend
2 that you might want to kind of compare these two
3 together in reality, just to make sure that things are
4 still pretty close. Let me give you an example.
5 There's a really good concept. You've really got the
6 model right. And then you went out and you took your
7 samples. You got a nice clean variogram, and your
8 model came out looking pretty good. And that when you
9 analyzed this number of samples. Let's say you made
10 a real bad guess. Now you're going to see where
11 Bayesian -- nothing's free. In the case of the
12 Bayesian, here's your estimate, and here's your real
13 data points. Here's somebody let's say trying to --
14 well, we don't have anything here we're going to
15 sample, and wind up taking a few samples there. And
16 their analysis comes out looking like this initially.
17 Says whoa, whoa, we've got some points up here that
18 are -- look clean, and we've got this area starting to
19 grow here, showing contamination. The impact of this
20 is that you got to this solution let's say with 150
21 samples. With 150 samples from this one you're going
22 to get something that looks like this. To take enough
23 samples to convince the Bayesian analysis that you're
24 right, you're going to have to take 800 samples. So
25 when people begin to use Bayesian analysis, a lot of

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1 care has to be taken in what they are going to use as
2 their priors and their assumptions that they make.
3 Like we're saying we don't want any undefined
4 assumptions. So from our standpoint that's kind of
5 good.

6 That pretty well covers it. However, I've
7 got some slides you may or may not have. We've got
8 the layering now so we can break it up into solid
9 pieces, individual pieces, and we're starting to work
10 on the third dimension of the kriging. We're getting
11 further and further into the correlation models.
12 That's where you start getting into things like
13 cokriging, covariance, statistics of statistics, if
14 you want to look at it that way. Here's a good
15 example that Pierre Goovaerts pulled out. We do how
16 to study here, or workshop here sometime ago, and this
17 has been a real good example. Here you have rain
18 data. Let's say you go ahead and do indicator kriging
19 on rain fallout, looks like might come down looking
20 something like this. You have another group of data,
21 let's say by elevation. That would be a little
22 mountainous area. And you combine eventually the data
23 from the elevation and the data from the analysis of
24 the rain, and you get a combination of how those two
25 would fit together. And surprise, surprise, your rain

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1 is occurring in the higher elevations, but you're not
2 stuck with this big mud ball, or big large area. It
3 begins to define it a little tighter. And this is the
4 effort that we're getting into on this next part of
5 this project, is to be able to do this cokriging
6 analysis, and covariance analysis in three dimension,
7 and using additional data.

8 Now, I may have some slides you don't
9 have. One of them being informed Elipgrid, getting
10 into the subsurface. And we've mentioned that we've
11 done things like we have lost the ability to scan
12 unless we use something else. So we can't go out with
13 a survey meter again. We're going to go out with a
14 magnetometer. We're going to go out with ground-
15 penetrating radar. We're going to look at the old
16 plans. There's a trench here. Everything.

17 Another one might be or is geostatistical
18 stimulation. We're bringing some people in from North
19 Carolina on this. And it'll hopefully take -- what it
20 does in short is it takes data that you have,
21 processes it, assumes that's the starting point, and
22 continues on for awhile until you come to some sort of
23 a continued realization. There's not enough
24 information to -- I don't understand it quite enough
25 yet to get into it too far.

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1 Another one that is quite useful is the
2 concept of your ground-penetrating radar, and a few
3 other things. These are the items that we are looking
4 at for big gain, able to set up cokriging, co-
5 analysis, to get a better handle on where the location
6 of contaminants are. We can now -- or are working on
7 getting photos to drape over the analysis area. One
8 of the problems that we've got right now is if you
9 have something with a mountain on it and you start
10 slicing it, it gets extremely difficult to do the
11 kriging and so forth on these sites because you have
12 a little slice up here. But now we're trying to build
13 it in so you can handle the surface geometry, which is
14 going to be really important when you start getting to
15 the underground configurations of the soil and so
16 forth. There are codes out there that can do some of
17 this stuff far better than we, but we've found that we
18 can probably do -- have a much broader variety, and it
19 doesn't cost the licensee anything. Some of the codes
20 out there cost several hundred thousand dollars a
21 year. In fact, SADA's being looked at by some of the
22 oil companies. In fact, it has been used in South
23 America already for a little bit of oil exploration on
24 simple core analysis.

25 That's -- you've seen the variogram 2D.

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1 We're shooting to go 3D. And we're looking at that
2 one as being really lots of fun because you don't have
3 to go very far to have variability, a lot of
4 variability in a short distance. And especially when
5 you start taking -- well, that's just pretty much it.

6 This is in case some of you are wondering
7 what Sequoyah looks like. Does anybody remember how
8 many wells there are? All those black dots are a
9 well, or a hole, or a sample point, or something like
10 that that was a core. It's well over a thousand I'm
11 told. And it was sufficient to change the groundwater
12 pattern on the site. And we don't want this to
13 happen, or I don't want it. That didn't seem like a
14 very good approach. There's a lot of historical
15 information and new information now that can be used.
16 At the time, probably not.

17 And I believe that concludes my
18 presentation. These were the ones that were dumped
19 out. Thanks Ruth. We have a giant help file. We had
20 a big long list of all the detail. Okay. All right.
21 That's it.

22 MEMBER WEINER: Thank you. Ken?

23 MEMBER CLARKE: I do have a couple of
24 questions, and maybe you could put that website back
25 up again at some point so we could get it. But I

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1 didn't see anything that indicated that this package
2 couldn't be used for both radionuclides and chemicals.

3 MR. POWERS: Oh, it's used for all of it.
4 If you look at the --

5 MEMBER CLARKE: You have the EPA
6 databases, IRIS and --

7 MR. POWERS: Yes. My advice to you is to
8 go to the user's manual on the website. It's
9 unbelievable. It has all the chemicals in the CASS
10 database. It has -- radionuclides are almost a side
11 note in it.

12 MEMBER CLARKE: Okay. Can you take us to
13 the -- you had two health effects calculation slides.
14 Can you take us to those? I don't know what numbers
15 they are. They were kind of in the middle.

16 MR. POWERS: Yes.

17 MEMBER CLARKE: The ones that referenced -
18 - well, let me just ask the question. You would go to
19 the EPA database for the toxicity factors, the slug
20 factors, the reference doses, and then you could
21 select a pathway.

22 MR. POWERS: Right.

23 MEMBER CLARKE: And then you would
24 construct and expose your pathway. And then you would
25 construct and expose your scenario. The risk

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1 assessment then, can that be done probabilistically as
2 well as deterministically?

3 MR. POWERS: Yes. It's done in the EPA
4 world. We're taking all of our dose calculations and
5 everything from things like RESRAD. Like one of the
6 features, or one of the things that we need is the
7 thing known as the area factor, you remember? For
8 radionuclides. Well, we can actually take the little
9 spreadsheet that comes out of RESRAD and just pump it
10 into here, and run through it. The EPA has been
11 handling the chemical side of it. I didn't want to,
12 you know, suggest that -- or spend too much time on
13 it.

14 MEMBER CLARKE: Sure. Just to get to the
15 bottom, I just -- we can construct different exposure
16 scenarios based on different types of land use, and we
17 can do the industrial versus residential versus
18 recreational or whatever. If we were looking at a,
19 you know, a particular future land use given that
20 data. And you could do the risk calculation either
21 deterministically or probabilistically.

22 MR. POWERS: Again, the human risk
23 assessment part of it has been set aside and is
24 handled in the EPA form, and has been tested and
25 validated for their use. We have not jumped into the

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1 risk assessment because there is so much going on in
2 this agency on ICRP, and a lot of it just, you know,
3 we're trying to stay as far away from politics, I'm
4 sorry, as we can, and stay as technical as we can.
5 How they use it, you know, it's something else.

6 MEMBER CLARKE: Okay. And you'd said
7 there are reports, additional details that are
8 available that would be mentioned on the website?

9 MR. POWERS: Right. Yes. Let me see if
10 I -- I'll tell you the easiest way to get to the
11 website. Do a Google search on "SADA EPA" and when
12 you see something that says TIEM, which is University
13 of Tennessee, go there, hit their homepage, and you're
14 in.

15 MEMBER CLARKE: All right.

16 MR. POWERS: The website is too long. I
17 can't even remember it.

18 MEMBER CLARKE: Okay, that's good advice.
19 Thank you.

20 MR. POWERS: Right, yes. And the -- we're
21 getting a lot of information, and the books that we're
22 using, or the information that we're using that's
23 available to everybody. Probably some of you have
24 seen this, but this is a good one to get started on.
25 It's a nice little elementary book on geostatistics.

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1 A lot of the initial code came out of GSLive. So
2 we've tried to keep everything that has a very good
3 pedigree behind it, and a lot of this has gone through
4 a fair amount of modification. And for those that are
5 up to abuse, there's Kressy's book, which is --
6 probably he and two other people in the world can
7 probably read it and understand the whole thing in
8 detail. But the one that we're focusing pretty much
9 everything on is that by Pierre Goovaerts. He's been
10 here, and he's going to be working on this next phase
11 of it to some extent.

12 MEMBER CLARKE: Just one more quick
13 question, just to clarify. The cost savings that you
14 referenced where using this approach you could reduce
15 the sampling cost by 40, 60, 80 percent, I assume that
16 was within the same sampling program design as
17 conducted originally. In other words, you didn't
18 reduce the cost by going to a different design.

19 MR. POWERS: Now, a lot of these were fuse
20 rad sites which had both chemical and there was an
21 initial design as I understand in most cases put
22 together, which was like a 58/49 type, every five
23 meters, something like that. And then they got into
24 the adaptive sampling aspects of it. And Robert
25 Johnson was able to through this process reduce it.

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1 We do have a little bit of a tweeky problem with the
2 process, and it deals with when you're taking the one
3 set of data, and going to put it with the hard set of
4 data, when you go to calculate what the data value
5 points should be at a point where there is a data
6 value, the closer you get to it once in awhile you'll
7 go into a negative correlation which just makes no
8 sense. And so we're futzing around with that a little
9 bit.

10 MEMBER CLARKE: Okay. Thank you.

11 MEMBER HINZE: Dr. Powers, you've covered
12 a lot of material here in a very short period of time.

13 MR. POWERS: About 10 percent of what
14 there is.

15 MEMBER HINZE: Well, let me ask you a
16 question. It seems to me the SADA is really focused,
17 as I've understood your presentation, on increasing
18 the efficiency of surveying and analysis and to
19 capture and evaluate the uncertainties in the
20 measurements. How, is that approximately correct?

21 MR. POWERS: That's pretty close, yes.
22 We're trying to optimize sampling where the least
23 amount of information is needed to get the best
24 result. Initial part of it is to visualize the data
25 that you have. I consider that almost in some cases

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1 as important as the analysis itself, because a lot of
2 times you can look at something and come up with a
3 solution that you probably wouldn't be able to do
4 mathematically. But the mathematics is there is
5 important.

6 MEMBER HINZE: That's right. How do you
7 capture the uncertainties in the studies that are
8 being made? For example, you showed us this GPR work.
9 There are multiple interpretations of that.

10 MR. POWERS: Oh yes.

11 MR. PALM: Some of them are more credible
12 than others. How do you capture the uncertainty in
13 the interpretation?

14 MR. POWERS: The linkage between the
15 things that are going to be doing covariance on and
16 cokriging on is our next step. We're fully aware of
17 the -- of how do I know what percent of this data is
18 going to apply to this.

19 MEMBER HINZE: But there are uncertainties
20 too simply in surface measurements. For example, most
21 of the surface measurements are integrated with GPS
22 for station location, for positional data. And
23 there's uncertainty in those. How is that captured in
24 all of this?

25 MR. POWERS: As far as location -- no,

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1 that's a good question because we don't. I mean,
2 we're starting out with samples. We're assuming that
3 they've put the samples where they say they are. But
4 I think you -- depending upon the amount of error that
5 you have it's going to have an impact let's say in
6 that particular case on things like shift, or.
7 Hopefully the site that you're working with is going
8 to have data that if you are off a little bit it's
9 going to be irrelevant, or you know, the cliché is
10 close enough for government work.

11 MEMBER HINZE: Well, you mentioned the use
12 of individual judgment. Do you provide -- does any of
13 this provide guidance on that?

14 MR. POWERS: That's what we're pulling
15 together during this next part. We're hoping to have
16 available within probably a year or a year and a half
17 a NUREG where we're starting to get some of this stuff
18 together on. In fact, if you're a biologist or a
19 zoologist or somebody like that, you're familiar with
20 binary classification. That's kind of the approach
21 that we're going to take when you walk into a site of
22 where you're going to start making a series of
23 choices. And to determine what the error is that
24 you're going to be required to handle. You're going
25 to have to go in ahead of time knowing how much error

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1 can I tolerate, and then you start looking at the
2 systems that you're going to use, and hope that they
3 get in there so you don't get into that situation of
4 bring me another set of data and we'll take a look at
5 it.

6 MEMBER HINZE: Thank you very much.

7 MR. POWERS: Yes.

8 MEMBER WEINER: Are there any burning
9 staff questions? We have a few minutes. I don't want
10 to cut into the next speaker's time too much.

11 MR. HAMDAN: It can wait.

12 MEMBER WEINER: Okay. Anyone in the
13 audience? No. Then thank you very much. And I'm
14 sure if people have questions they can come back to
15 you.

16 The next speaker is here. I understood
17 Michelle Sampson. Oh, there you are. Good to see
18 you. I'll give George a chance to get all his vast
19 data sets together. Our next presentation is by
20 Michelle Sampson from the Federal Railroad
21 Administration on the use of dedicated trains for
22 transportation of high-level radioactive waste and
23 spent nuclear fuel. So welcome, Michelle. It's all
24 yours. Oh, sorry. He walked away with the mic. Do
25 you want to use this?

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1 MS. SAMPSON: I'll just use this. I'm
2 Michelle Sampson, and I do work with the Federal
3 Railroad Administration. We're one of the operating
4 administrations from the Department of Transportation,
5 and I am pleased to be here today to talk with you
6 about our dedicated train study. The title of the
7 study I believe Earl was able to provide a copy of the
8 report to Congress to you. It is Use of Dedicated
9 Trains for Transportation of High-Level Radioactive
10 Waste and Spent Nuclear Fuel.

11 The first thing that I would like to
12 discuss is a little bit of the history of the report.
13 And I have to apologize to you right now. The expert
14 on the history of this report is Kevin Blackwell with
15 our office. He's been intimately involved with this
16 report since its inception, and could probably answer
17 any question about the many perambulations and changes
18 that the report's gone through off the top of his
19 head. I only joined the Federal Railroad
20 Administration about a year and a half ago, and am not
21 as familiar with the history of this report. As
22 you'll see in a moment it's been ongoing for quite
23 some time. I will do my best to answer questions for
24 you. In the event that I don't have the information
25 with me I certainly will take that information down

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1 and make sure that we get back with you to provide an
2 answer.

3 One of the keys to understanding the
4 report to Congress is to know a little bit about the
5 study methodology, some of the assumptions and
6 decisions that were made at the outset, and how those
7 impacted the study findings. We'll discuss the study
8 findings, and then just briefly I'll talk with you
9 about Federal Railroad Administration's path forward
10 now that we have published the report to Congress.

11 As I mentioned this has been a process
12 that's been ongoing for quite some time. The study
13 was mandated by HMTUSA 1990. That public law had two
14 specific requirements. It required the Federal
15 Railroad Administration to perform a study that would
16 compare the safety of dedicated trains to other
17 methods of rail transport. That was due to Congress
18 in November of 1991. It also required the Federal
19 Railroad Administration, once the study had been
20 completed, to take those findings into consideration
21 and review FRA's existing regulations for safe rail
22 transportation. We're a little late. Funding for
23 the study was not appropriated until the spring of
24 1992, and at that time Federal Railroad Administration
25 identified VOLPE National Transportation Systems

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1 Center as a partner to assist us in preparing and
2 conducting this study.

3 The study really was kicked off with a 2-
4 day workshop in Denver, Colorado in September of 1992.
5 That workshop was attended by representatives of
6 potentially affected stakeholders, states, Native
7 American tribes, the railroad industry, shippers,
8 potential shippers of spent nuclear fuel and high-
9 level radioactive waste. It was also attended by
10 representatives from the Department of Energy and the
11 Nuclear Regulatory Commission.

12 Utilizing the products of that public
13 meeting, a first draft report was generated in
14 February of 1993. That draft went into a review
15 process within the Department of Transportation.
16 Comments were provided to VOLPE. The VOLPE centers
17 provided a series of revisions and updates to that
18 report. The report has also been coordinated with the
19 Department of Energy and the Nuclear Regulatory
20 Commission. There have been several meetings between
21 the departments to discuss the report, and get input
22 from the experts within Department of Energy and
23 Nuclear Regulatory Commission to assist us at FRA with
24 our report.

25 In 2001 and 2002, a significant effort was

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1 made to update and revise the early 1990s report, and
2 as we began to look at some of the assumptions and
3 some of the findings of the report you will see that
4 it does incorporate data through 2001. So it was
5 significantly updated and revised in the interim. And
6 at FRA we did publish a final report. The report is
7 dated March, 2005. It was actually transmitted to
8 Congress in September of 2005.

9 I mentioned understanding a little bit
10 about the study methodology. The report to Congress
11 that you may have had an opportunity to look at talks
12 in some general terms about the study methodology, but
13 there are a lot of basis and assumptions that affected
14 that that are not fully discussed in that report to
15 Congress. The study was required to do comparative
16 analysis. We did comparative analysis on three
17 specific types of train service, regular trains, which
18 would be your general freight consist, key trains.
19 That's an industry term for a train that is identified
20 as hauling specific quantities of certain hazardous
21 materials. The key train concept actually is a large
22 part of the 2001 revision. As we begin discussing the
23 key train you'll see it's based on a 2001 Association
24 of American Railroads industry standard. And then of
25 course dedicated trains. There's also a standardized

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1 cask prototype, and the details of that cask impact
2 the outcomes of the study finding. And a decision was
3 made that representative routes would be selected and
4 used for comparison.

5 I mentioned the first type of service that
6 we reviewed was regular train service. Those are
7 general freight trains. They operate at allowable
8 freight track speeds, make numerous classification
9 yard entries for making up the train, and certainly
10 would haul other hazardous material freight along with
11 the cask consist. Those trains are subject to the
12 hazardous material regulations and of course FRA's
13 rail safety regulations, but there were no other
14 limitations or operational controls put on those
15 trains. The study modeled regular train service as a
16 generic 70-car train, and the cask consist was modeled
17 as being directly in the middle of this train. One
18 thing that I would like to note is that's the way it
19 was modeled. In actual regular train service, the
20 weight of the cask car and cask consist, train track
21 dynamics would make that a poor placement for the best
22 operation of the train. The optimal place would be
23 near the front of the train to improve the train track
24 dynamics and fuel efficiency of the locomotives. But
25 it was modeled as being directly in the middle.

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1 Key trains. We incorporated key trains
2 based on a 2001 Association of American Railroads
3 recommended practice circular. I've listed that here.
4 That circular's been updated by the industry since
5 2001, and has had some minor changes, but the key
6 train that was modeled was based on the 2001 circular.
7 For our study we determined that the only operating
8 restrictions of the AAR circular that would impact our
9 train was the speed restriction. In the operating
10 circulars, trains hauling these specific hazardous
11 materials are restricted to a maximum of 50 miles per
12 hour, regardless of the authorized speed on the track.
13 Other than the speed restriction, the key train was
14 modeled as having the same length and configuration,
15 and going through the exact same operating
16 environment, the same number of yard entries, same
17 passing restrictions. A key train would certainly be
18 expected to have additional hazardous material freight
19 as part of the consist.

20 And dedicated trains. In the study,
21 dedicated train was modeled as a 6-car consist, two
22 locomotives, two buffer cars, the cask car, and an
23 escort car. In the discussion, all of the results and
24 findings of the study are based on one cask car
25 transportation. The operational limitations for the

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1 dedicated trains. Speed was restricted to 50 miles
2 per hour. The dedicated train was assumed to be under
3 a no passing rule which means that on mainline track,
4 either the dedicated train or the other train would be
5 moving only one at a time. The dedicated train would
6 have priority to pass, and we would expect other
7 freight consist trains to be standing still. That
8 impacts the probability that the trains will hit each
9 other in passing, and so the no passing rule is a key
10 operational limitation. Also, because the key train
11 does not have other freight cars, it would limit
12 visits to classification yards. The number of yards
13 that the key train would pass through would be reduced
14 somewhat. The primary reduction is in the amount of
15 time that those cars would spend in the classification
16 yard because they would not need to be switched. They
17 could pass through directly.

18 The cask description. As the study was
19 envisioned, the number of casks and the availability
20 of information on spent fuel casks that might be
21 available, spent fuel and high-level waste casks that
22 might be available, was more limited than it is now.
23 At the time that the study was developed, the cask
24 that was selected to be used for the study was 125 ton
25 steel, lead steel, prototype cask. One thing that the

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1 report to Congress does not really make perfectly
2 clear, both the technical study that supported that
3 report to Congress, the NRC's cask certification
4 criteria was established as an upper bound of the
5 functional strength of the cask. That has certainly
6 been a controversial decision as the report has gone
7 through its reviews, but it is important to understand
8 that that's a decision that was made up front in the
9 way that the study was developed. In addition to
10 those certification criteria, VOLPE and the FRA
11 utilized Sandia's report, the NUREG 6672 which was a
12 study of this cask prototype without impact
13 delimiters, and that was used as input for the rail
14 crash analysis. So those are important factors for
15 how the report itself was developed.

16 I mentioned that the study is designed to
17 be a comparative analysis. In order to do some type
18 of comparison, the FRA and VOLPE needed to have some
19 shipments to evaluate. A decision was made. Six
20 routes were chosen. The origin points were selected
21 from existing nuclear power plants and high-level
22 waste repositories. The destination point selected
23 for the study was the Yucca Mountain facility in
24 Nevada. The goals of selecting the representative
25 routes were to utilize the major east-west rail links,

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1 and to select representative geographic locations and
2 links for the transport itself. Those specific links,
3 exactly how rail traffic would travel from origin to
4 destination were determined using Oak Ridge National
5 Lab's inter-line routing model. And those were just
6 based on a most likely traveled route. There were no
7 additional routing decisions incorporated into that.

8 This is a little small but not too bad.
9 These are the six routes that were selected.
10 Obviously the origin points are identified there. You
11 can see the length in miles from that origin point to
12 the selected destination facility. The population
13 data for those routes is based on the 2000 census.
14 That was updated in 2001. Just to note, the Routes 1
15 and 6 are the shorter routes, and Route 5 is the
16 longest route. As we began to look at some of the
17 findings they're listed by route number, not by
18 origin.

19 Utilizing those inputs. That's the basis
20 for the study. The study itself performs a comparison
21 of the radiation dose risk for each of the six routes
22 under incident-free transportation and under
23 identified accident conditions. In addition to that
24 risk comparison study, the FRA began a preliminary
25 consideration of operational safety. And the report

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1 to Congress also incorporates those operational safety
2 considerations that were identified by the FRA.

3 Our incident-free transportation
4 comparison was calculated using Radtran with the
5 assistance of Sandia National Lab. It took the six
6 representative routes and other inputs that were
7 decided and selected. The cask dose rate was assumed
8 to be 10 mrem/hour at one meter. That does correspond
9 to DOT's non-exclusive use limit. It does not
10 correspond to any data on shipments that have taken
11 place. It was simply selected as the cask dose rate
12 that would be used for the study. The consist
13 description, again I mentioned, 70 cars for a regular
14 key train, and a 6-car consist for the dedicated
15 train. That was input into Radtran along with the
16 service type and speed limitations, the impacted
17 populations from the 2000 census, and shielding
18 factors for the type of area that the train would be
19 traveling through, urban, suburban, or rural.

20 The results of the Radtran analysis were
21 expressed as population dose and person rem. And
22 those were converted into latent cancer fatalities
23 utilizing the conversions of the NCRP report. We
24 looked at those results and evaluated them by route.
25 They're also evaluated by service and speed for

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1 comparison of dedicated train to regular train service
2 to key train service. Also, by population type.
3 Populations were broken down into various rail
4 workers, members of the public. And we looked at the
5 population doses for in-transit dose versus dose
6 during stops.

7 And looking at the accident-related risk,
8 again the goal is to compare radiological exposure due
9 to the accidents in regular service, key train service
10 and dedicated train service. The accident involvement
11 probability, accident severity probability and
12 expected consequences were identified. For regular
13 train service, the study started with regular train
14 service, and three event trees were constructed. The
15 first was for movement on mainline track, the second
16 was for consist movements within the yard and a
17 separate third event tree was developed for fire
18 events. Fire events of course could be an initiating
19 event, or they could be the outcome at any node in the
20 other trees, so they were handled separately. The
21 Federal Railroad's existing Railroad Accident
22 Information System was used to define and categorize
23 those accident types. And the baseline accident
24 probability was calculated for regular train transport
25 utilizing data from 1988 through 2001. The total

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1 number of accidents per year was normalized by
2 dividing it by the reported train miles per year for
3 each year.

4 The accident types that are contained
5 within the FRA's accident database are derailment
6 accidents, collision accidents, and there's a variety
7 of different collision accidents that are tracked,
8 crossing accidents, miscellaneous other accidents, and
9 then the fire and explosion accidents. The accident
10 severity for the mainline and the yard trees. The
11 impact velocity for the accidents was identified to
12 determine probability and severity, and for the fire
13 event tree the severity as based on fire intensity and
14 duration. The accident consequences were described in
15 terms of the cask damage and the resulting radiation
16 exposure.

17 For key trains, the baseline normal
18 transportation or incident-free transportation event
19 trees were modified to reflect the speed restriction
20 to 50 miles per hour and the improved braking that
21 would come as a result of that speed restriction. The
22 probability for accident -- or the accident type
23 probabilities were decreased only for the collision
24 and obstruction accidents where speed was a factor in
25 the accident, and for the highway, rail or rail-rail

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1 crossing accidents where speed was a factor. Those
2 were very minor decreases in the accident probability.

3 For dedicated trains, those event trees
4 were modified to reflect the operational restrictions
5 of the dedicated train. And as I mentioned earlier,
6 there were significantly more operational restrictions
7 for dedicated trains. The number of yard entries is
8 decreased as is the amount of time spent in each yard,
9 the consist length is far shorter, only six cars for
10 the dedicated train, passing restrictions, the speed
11 limit of 50 miles per hour, and the fact that no other
12 hazardous material cars can be a part of the train
13 consist. Those operational restrictions resulted in
14 significant reductions in the accident type
15 probability for all types of the accidents except for
16 those accidents who are affected by train frequency.
17 Clearly by utilizing dedicated train with only one
18 car per train consist, you are increasing train
19 frequency. However, the number of increased trains as
20 compared to the total train miles in the United States
21 was so small there actually was no increase in that
22 accident type probability. It had no change.

23 MEMBER HINZE: Excuse me, if I might. In
24 terms of the operational restrictions, was the
25 consideration ever given to excluding major urban

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1 areas?

2 MS. SAMPSON: Not in this study. We did
3 not look at that, no.

4 MEMBER HINZE: Why is that?

5 MS. SAMPSON: Unfortunately that is one of
6 the questions about how the study was set up
7 originally, and I was not involved in those decisions
8 that were made. You may know more about it.

9 MEMBER WEINER: I can comment on that when
10 we get through.

11 MEMBER HINZE: Okay. Thank you.

12 MS. SAMPSON: But no, it was not. The
13 linkage, the route that the train was transported
14 across from those origin to destination points was
15 simply identified as a most likely traveled. It did
16 not take any other factors into consideration.

17 The accident rates. After the event trees
18 were developed, it was identified that the overall
19 mainline transport accident rate for all of the
20 accident categories and the yard accident rates were
21 virtually indistinguishable for regular and key
22 service. Again, the only operational restriction for
23 key service was a reduction in speed to 50 miles per
24 hour, and that did not make a significant impact on
25 those accident rates. So as we look at the findings,

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1 you'll see that for mainline and yard accident rates,
2 regular and key service were combined.

3 The overall mainline accident rate for
4 dedicated train service was only reduced by about 3.8
5 percent less. However, the overall yard accident rate
6 for dedicated train service was reduced by 75 percent
7 less, and intuitively you would expect to see that
8 type of a reduction because of the significant
9 reduction in the amount of time spent in
10 classification yards by the use of a run-through train
11 instead of a train that had to be stopped, cars
12 separated, train broken up and then put back together
13 again.

14 I mentioned that cask damage and dose rate
15 were utilized to identify the consequences. The FRA
16 and VOLPE identified four accident severity
17 categories. Category 1 was identified, an accident
18 that resulted only in delay. That delay event would
19 not result in any dose increase from the baseline dose
20 of the cask, which as I mentioned earlier was assumed
21 to be 10 mrem/hour at one meter. Accident Type 2's
22 were those accidents that could result in a dose
23 increase to 1,000 mrem/hour at one meter but no
24 release of radioactive material. The third accident
25 category were accidents that would result in loss of

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1 shielding or internal damage, and the dose rate was
2 anticipated -- or dose rate was assumed to increase to
3 4.3 rem/hour at one meter. The fourth category of
4 accident would have been an accident resulting in
5 release of the radioactive contents. That category of
6 accident was analyzed to be equally unlikely for all
7 of the shipping -- or was identified to be equally
8 unlikely for all of the shipping options and was not
9 further analyzed.

10 Dose accident consequences were calculated
11 again using Radtran 5. Doses to the general
12 population, rail workers and emergency response
13 personnel were identified. The findings we'll look at
14 in a moment. A Category 1 accident was determined to
15 result in a 10 hour delay. The Category 2 and
16 Category 3 accidents were looked at over a range of
17 delays lasting between three and 72 hours. The
18 accident comparison is between regular and key service
19 combined with dedicated train service, because again
20 the accident probabilities for -- or accident
21 probabilities for regular and key service were
22 indistinguishable once we finished the event trees.

23 After the determination of the person, rem
24 and latent cancer fatality findings was completed, the
25 FRA determined that there were operational safety

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1 considerations that should be taken into consideration
2 in looking at these different types of service that
3 weren't fully addressed by just looking at the
4 radiation risk of transportation.

5 CHAIRMAN RYAN: Can I just pick up a
6 little follow-up question.

7 MS. SAMPSON: Sure.

8 CHAIRMAN RYAN: I'm troubled by the use of
9 fatal cancer risks. The reason is is it's absolutely
10 incorrect to apply a fatal cancer risk expectation
11 value to an individual dose or to a dose to a small
12 group. The idea of person rem here is meaningless.
13 It's very conservative and just flat out wrong to use
14 a cancer risk indicator for these small groups. So
15 can you maybe give me some insight as to why you did
16 that, or why didn't you just stick with dose? It's so
17 much simpler and more accurate.

18 MS. SAMPSON: Unfortunately again I
19 cannot, and I apologize.

20 CHAIRMAN RYAN: Okay.

21 MS. SAMPSON: You would have benefited by
22 having someone who was more --

23 CHAIRMAN RYAN: And I don't mean to put
24 you on the spot. I appreciate that, but I just wanted
25 to, for everybody's benefit, point out that these

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1 risks of fatal cancers are just flat out wrong. I
2 mean, it's a misuse of an expectation value of a
3 distribution. Thank you.

4 MS. SAMPSON: Yes. The study looks at a
5 relatively small dose over a very large population,
6 and then does use that to.

7 CHAIRMAN RYAN: We're on record on several
8 occasions as a committee of pointing out that's just
9 wrong.

10 MS. SAMPSON: However, there are several
11 assumptions and decisions that were made at the onset
12 of the study that resulted in the findings being what
13 they are, and it is important to understand what those
14 assumptions were because they do affect how the
15 findings of the study came out.

16 MR. THADANI: Mike, also impact limiters
17 were not considered.

18 MS. SAMPSON: They were not.

19 MR. THADANI: So that's significant.

20 CHAIRMAN RYAN: Sure. And I appreciate
21 that additional point, but it's -- I think it's very
22 important to recognize that, you know, a dose
23 calculation doesn't automatically translate into a
24 cancer risk calculation. It has to be done with great
25 care, and even with -- well, I mean let's leave it at

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1 that. Thanks.

2 MS. SAMPSON: Taking into consideration
3 comments that we had received on this study, and also
4 FRA's review of the study, at FRA we felt that there
5 were operational safety considerations that should be
6 identified in looking at the differences between
7 regular, key and dedicated train service, and that
8 looking strictly at the radiation risk did not fully
9 identify those operational safety improvements that
10 could be realized. Obviously reduced time in transit
11 and switching operations does reduce your radiation
12 risk. However, avoidance of switching and the
13 classification yard is a significant operational
14 safety consideration. In looking at the accident
15 data, a significant portion of accidents do happen in
16 switching operations, and being able to completely
17 avoid switching operations is a significant
18 improvement to the operational safety for the train
19 itself.

20 You have a reduced derailment and
21 collision potential if you utilize some of the newer
22 technology that's available. The electronically
23 controlled pneumatic brakes that are available could
24 be used on a dedicated fleet of rail cars, and the
25 uniform consist significantly improved the train track

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1 dynamics, and braking capabilities of that train,
2 which of course make it far more safe operationally.

3 Other potential operational enhancements.
4 If you're using dedicated equipment operated in
5 smaller consist you have less wear and tear on the
6 equipment. There would be fewer mechanical
7 malfunctions anticipated for the equipment utilized in
8 dedicated train service. You have a reduced risk from
9 interaction of other hazardous materials in the event
10 of a derailment or collision. The risk analysis -- or
11 the radiation risk analysis took that into
12 consideration in reducing the time that it took to
13 respond to a dedicated train accident versus regular
14 key service. However, the operational consideration
15 there is the increased or improved ease of response to
16 the emergency responders when they're only dealing
17 with one hazard, the reduced amount of time that it
18 takes to clean up a derailment if you have six cars in
19 the consist versus 70 cars or more.

20 And in addition to the ECP brake
21 technology that I discussed just a moment ago, there
22 are additional potential engineering enhancements that
23 could be utilized. ECP brakes require a
24 communications backbone that links the cars, and
25 various types of onboard defect detectors are being

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1 tested, and some are in utilization, and with a
2 dedicated fleet and a small consist those could be
3 utilized quite effectively to improve the operation of
4 the train.

5 If you have had a chance to look at the
6 report to Congress you will see that the findings in
7 the report to Congress were that the VOLPE study
8 indicated that risk to the employees and the public
9 from transportation of spent nuclear fuel high-level
10 radioactive waste is low, but on a comparative basis
11 dedicated trains appear to offer advantages over
12 general consist. And if you have not had an
13 opportunity to look at the report to Congress it is
14 available online from FRA's website, which I have
15 listed here. Our website is not the easiest to
16 navigate, but the report's available under our safety
17 publications links.

18 The report concludes that on a comparative
19 basis that dedicated trains are safer. One thing I
20 would like to provide is some of the numbers that back
21 up that comparative basis. And one of the things
22 that's important to recognize when you look at these
23 numbers is dedicated train service is comparatively
24 safer based on this, but the numbers are very, very
25 close, and the numbers are very, very small. I

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1 mentioned the routes. Routes 1 and 6 were your
2 shortest routes under normal conditions of
3 transportation those have the lowest total person rem,
4 which of course results in the lowest latent cancer
5 fatalities. That's merely a function of the reduced
6 time in transit. Less time exposed to the shipment
7 results in lower dose rates. Route 5 I think was the
8 longest.

9 CHAIRMAN RYAN: Just another follow-up
10 question. I have to point out, I can't accept four
11 significant digits. I see 0.1 or 2 as your total
12 person rem, and I see something like, oh I don't know,
13 pick a rounded off number, 4 times 10^{-5} , and I would
14 challenge anybody to prove to me that any of these are
15 different, or any doses are different.

16 MS. SAMPSON: Yes.

17 CHAIRMAN RYAN: So I see one number.

18 MS. SAMPSON: And we'll get to that in a
19 moment.

20 CHAIRMAN RYAN: Okay.

21 MS. SAMPSON: No, I do think it's
22 important to realize they are very, very small
23 numbers.

24 CHAIRMAN RYAN: Well, and it probably
25 misrepresents your level of certainty to use four

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1 significant digits. It's just not right.

2 MS. SAMPSON: The accident findings are
3 very similar. As I mentioned, the regular and key
4 train services were combined in looking at the
5 accident findings. Where you see the R/K that's
6 regular and key service, and D of course is the
7 dedicated train service. For the accident events for
8 Category 1 accidents the duration of the delay event
9 was assumed to be 10 hours. There is some comparative
10 reduction in the numbers for dedicated train service,
11 but again, the numbers are very, very close. For
12 accident categories or event Categories 2 and 3, there
13 is more of a difference, but the overall numbers are
14 still very small.

15 The issue you just alluded to is really
16 when you look at these study findings, what the study
17 identified is that non-incident risk from the entire
18 shipping campaign. And we based our definition of the
19 shipping campaign on the number of rail shipments
20 identified in the Department of Energy's EIS. It's
21 appreciably less than one latent cancer fatality,
22 regardless of the type of service. That's the
23 baseline finding of the study.

24 And that is -- oh, our path forward.
25 Thought I was done. That is the finding of the study.

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1 FRA of course had a part two from the 1990 HMTUSA, and
2 that was to determine if rulemaking is warranted. FRA
3 is in the process of developing cost-benefit data
4 associated with the dedicated train study. We're also
5 reviewing the industry operating and maintenance
6 standards that have been published post-study. Quite
7 a bit of work has been done by the industry. AAR has
8 updated the key train circular, which was mentioned as
9 the basis for the 2001 incorporation of key trains,
10 and also have developed a standard S2043 for equipment
11 use for high-level waste or spent nuclear fuel
12 shipments. FRA is reviewing those. And we also are
13 actively interested in and reviewing Department of
14 Energy and industry shipment planning documents. A
15 determination of whether rulemaking is warranted or
16 not should be made within the next 18 months by the
17 FRA. We're also in the process of reviewing and
18 updating our internal safety compliance oversight plan
19 for shipments of high-level waste and spent nuclear
20 fuel to ensure that FRA's internal inspection
21 resources are focused where they can be most
22 effective. And now I'm done. So any question?

23 MEMBER WEINER: Thank you very much.
24 We'll go around the table. Dr. Hinze?

25 MEMBER HINZE: I'll pass.

1 VICE CHAIRMAN CROFF: Yes, I had one
2 question. In reading the report that you're
3 summarizing, if I understood it correctly near the end
4 it basically said that most spent fuel or high-level -
5 - I guess spent fuel mostly right now shipments are
6 occurring by dedicated train right now anyway. Is
7 that -- do I remember that correctly?

8 MS. SAMPSON: That is the information that
9 FRA has been provided on shipments of spent fuel that
10 have been made is that the majority of them do take
11 place by dedicated train at this time, yes.

12 VICE CHAIRMAN CROFF: Okay. All right,
13 thank you.

14 MEMBER WEINER: Further comments? Jim?

15 MEMBER CLARKE: Just one. Could you back
16 up a couple slides? You had a couple of tables I
17 think. Very, very close to the end.

18 MS. SAMPSON: Just a moment. Be glad to.
19 Were you interested in the accident table or the non-
20 incident?

21 MEMBER CLARKE: The final comparisons.

22 MS. SAMPSON: Okay. This is the
23 comparison of total dose.

24 MEMBER CLARKE: Yes, that'll work.

25 Actually the next one's probably better.

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1 MS. SAMPSON: Okay. Yes.

2 MEMBER CLARKE: Okay. As Dr. Ryan said,
3 we have problems with collective dose, and you know
4 that so I won't go into that anymore. But if you look
5 at the methodology that you used in the results,
6 actually I want the slide, the one you had. It was
7 one up. Previous.

8 MS. SAMPSON: Oh, okay. Certainly.

9 MEMBER CLARKE: Again, apart from the --
10 as a chemist in a former life I don't like to see that
11 many significant figures either, but it's not a unique
12 problem. Those numbers look all pretty much the same.
13 I mean, the regular and key were -- even though the
14 key train had operational limitations compared to the
15 regular it looks like the results were
16 indistinguishable.

17 MS. SAMPSON: The operational limitation
18 of 50 mile an hour speed restriction was
19 indistinguishable by the time you transported it over
20 several thousand miles.

21 MEMBER CLARKE: And even if you factor in
22 reasonable uncertainties there doesn't appear to be
23 much difference between the regular and key.

24 MS. SAMPSON: I think that's a valid
25 conclusion.

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1 MEMBER CLARKE: Is that a valid
2 conclusion?

3 MS. SAMPSON: The study was of course
4 conducted by VOLPE with FRA, and a decision was made
5 early on that this was the method that would be used
6 for comparison. At the conclusion of the study, as
7 you can see, the comparison is that you have less than
8 one. What FRA does believe is that there are
9 operational considerations which do impact the safety
10 of transportation. Clearly the technological
11 enhancements that are available with the smaller
12 consist. And it would not have to be a one cask car
13 consist. You could have a number of cask cars in a
14 dedicated train and still benefit by use of dedicated
15 fleet of cars, and the communications backbone that
16 would be available with the ECP braking, and
17 additional onboard sensors for bearing defect and
18 failures that really do enhance the safety of this.
19 Clearly, limiting the number of cars in a derailment,
20 and limiting the interaction of other hazardous
21 materials during a derailment are significant
22 operational enhancements, independent of the
23 comparative radiation risk analysis that was done.

24 MEMBER CLARKE: That's really not risk,
25 but you know, the comparison that you did. Okay,

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1 thank you.

2 MEMBER HINZE: While you have this up
3 there if I may, my recollection is that Number 6 was
4 Hanford as a source, and Number 1 was Humboldt, if I
5 recall correctly.

6 MS. SAMPSON: Yes.

7 MEMBER HINZE: And there was quite a
8 difference between the population density per line
9 mile in 1 and 6, but the distances were relatively the
10 same if I recall. And yet these numbers come up quite
11 close. Does this mean that the population density
12 along the line mile is really not a very significant
13 factor?

14 MS. SAMPSON: I think I would defer maybe
15 to Dr. Weiner, her familiarity with the Radtran
16 program. And that's really a function of the Radtran
17 program. She probably can speak to that better than
18 I can. If that's?

19 MEMBER WEINER: That's fine. As long as
20 you've point out, I'll make two points. The routing
21 code that was used for this was INTERLINE, and it is
22 really -- it's really more a function of the routing
23 code than of Radtran itself. The INTERLINE uses
24 existing railroad tracks and population densities
25 within a half mile of the route. The existing

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1 railroad, the use of existing railroad tracks answers
2 the question you asked awhile ago, which is tracks go
3 from city center to city center. So if you try to
4 avoid urban areas, you have a very, very long route.
5 The second thing is that the longer the route, what
6 almost any routing code will tell you is the longer
7 the route, the more the results that you get look
8 alike. And because you're integrating, you're
9 spreading the population over a very long route, and
10 on the average these become very close to the national
11 average, rural, suburban and urban populations. And
12 by the way, when you divide into rural and urban
13 populations, the population divisions are also a
14 function of the routing code itself. These were
15 developed by Oak Ridge as part of the routing code, so
16 that's why these things look alike.

17 I have to add my objection to four
18 significant figures, and I already have transmitted
19 this to the FRA people.

20 CHAIRMAN RYAN: Could you back up to the
21 accident slide.

22 MS. SAMPSON: The one showing the numbers?

23 CHAIRMAN RYAN: Yes. Next slide I guess
24 it is. In your accident cases, did you do a
25 deterministic, you know, here's what happens, here's

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1 the dose, or did you do a sampling, or a probabilistic
2 analysis, or how did you arrive at 70.90 person rem?

3 MS. SAMPSON: The FRA's rail accident
4 database was utilized. And utilizing FRA's historical
5 rail accident database from 1988 through 2001, actual
6 accident numbers were utilized to determine
7 probabilities. Those numbers were normalized --

8 CHAIRMAN RYAN: That's the accident
9 happening part. I'm talking about the consequence.
10 How is that assessed?

11 MS. SAMPSON: The consequences are based
12 on the cask performance dependent upon the information
13 that we gain. What type of accident we identify that
14 it would be, and then the cask response to that
15 accident type. And Earl would like to speak up about
16 that.

17 CHAIRMAN RYAN: It's deterministic is my
18 question.

19 MR. EASTON: I think these accident doses
20 are really based on emergency --

21 CHAIRMAN RYAN: And tell us who you are
22 please.

23 MR. EASTON: Back again. Earl Easton with
24 the staff. I think these accident doses were really
25 based on the emergency response, and how long it would

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1 take, and how complicated --

2 CHAIRMAN RYAN: I'm asking a real simple
3 question, Earl. I don't want to go through the
4 scenario. Is it deterministic or probabilistic?

5 MR. EASTON: I think it's deterministic.

6 CHAIRMAN RYAN: Okay, that's what I wanted
7 to know. Because I think that's something where
8 there's an opportunity to gain insight. If you're
9 just assuming one set of accident parameters, that is
10 the cask gets whacked, there's a fractional release,
11 the fractional release exposes X people in a certain
12 way, and we come up with 70.9 rem when we add that all
13 up, that's one realization. What are the other
14 realizations that you could come up with to gain
15 insight?

16 MR. EASTON: This is based on loss-of-
17 shielding accident as opposed to a release, I believe.

18 CHAIRMAN RYAN: Whichever. My point is
19 it's a deterministic one-off set of assumptions,
20 correct? That's what I need to know. Again, I think
21 that's an area where if you wanted to look at an
22 improvement, it would be to try and identify some
23 critical group and then do a number of realizations,
24 and a number of scenarios to see what impacts might
25 be. It's a way to think about it in a little bit more

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1 of a probabilistic sense.

2 MS. SAMPSON: And again, the cask
3 prototype here was a steel-lead-steel cask, which is
4 important in the loss-of-shielding issue.

5 CHAIRMAN RYAN: Sure. Absolutely. Thank
6 you.

7 MEMBER WEINER: Just to respond to that
8 last, the raw analytical results from the analyses
9 were not available in the final report, and they were
10 not -- I haven't looked at them. However, if indeed
11 Radtran was used to calculate the accident dose risks,
12 this was done probabilistically and not
13 deterministically.

14 CHAIRMAN RYAN: Well, this is
15 deterministic --

16 MEMBER WEINER: Well, yes but he didn't --

17 CHAIRMAN RYAN: -- you don't know, but
18 maybe --

19 MEMBER WEINER: That's correct.

20 MS. SAMPSON: The input into Radtran --
21 and let me back up. Maybe I can help with this a
22 little bit. The accidents were based -- the
23 historical FRA accident data was analyzed, and then
24 was grouped into predefined accident categories to
25 determine the probability that you would have an

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1 accident in one of those categories. And then those
2 dose rates of the accident categories were the inputs
3 that were put into Radtran, along with the anticipated
4 delay time, to come up with the dose rate. So.

5 CHAIRMAN RYAN: It's this information that
6 led me to conclude it's deterministic.

7 MS. SAMPSON: So the delay event was
8 assumed to be an additional 10 hours on top of the
9 regular transport time with the cask remaining at 10
10 mrem/hour for that entire duration. Radtran was used
11 to evaluate all six of the transportation routes. The
12 same was true for accident Category 2 and accident
13 Category 3, and the delay time for regular and key
14 train service was determined to be slightly longer
15 than the delay time for dedicated train service, which
16 is really what results in your increased dose rate for
17 those evaluations.

18 MEMBER WEINER: Yes, which indicates that
19 in fact Earl is correct because the probabilistic
20 aspect of Radtran accident analysis was not used.
21 These were --

22 MS. SAMPSON: This is the way --

23 MEMBER WEINER: That was --

24 MS. SAMPSON: I'm sorry if I was a little
25 slow getting all that put together, but.

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1 CHAIRMAN RYAN: No, I appreciate the fact
2 that you're following up on where it preceded in your
3 text, and we appreciate that.

4 MEMBER WEINER: I have a couple of
5 questions. One is why was there any reason for using
6 6672 rather than the modal study, for example.

7 MS. SAMPSON: I don't believe the modal
8 study was completed when they started doing this. I
9 may be wrong about that.

10 MEMBER WEINER: Well --

11 MS. SAMPSON: It was completed during the
12 time --

13 MEMBER WEINER: It may be a question you
14 can't answer. How did your results compare with the
15 Yucca Mountain EIS? Did you do any -- did FRA do any
16 comparison?

17 MS. SAMPSON: We have not done any
18 comparison to date, no.

19 MEMBER WEINER: Finally, is there an
20 accident that in this suite of accidents, is there
21 something that would correspond to the Baltimore
22 Tunnel Fire?

23 MS. SAMPSON: Jump in. Feel free.
24 Please.

25 MEMBER WEINER: Yes, Earl?

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1 MR. EASTON: And the reason I'm jumping in
2 is the original law said the FRA DOT in consultation
3 with the NRC should do this study. So we did review
4 the underlying technical stuff. What the VOLPE center
5 conclusions were, that accidents involving fully
6 engulfing fires at greater than the NRC cask
7 certification's duration and intensity would be
8 reduced by 89 percent. But the numbers again are very
9 small. They'd be reduced from 1 in 4.2×10^{-15} to
10 4.6×10^{-16} . It's an 89 percent reduction, but when you
11 work out in terms of years, that's once in every 250
12 million years versus once in every billion years for
13 this campaign. So the numbers are very, very small
14 reduction in that type of event.

15 CHAIRMAN RYAN: And that's one side of the
16 story. The probability of an event is one thing to
17 consider. But the consequences is the second part,
18 and I think it's risky to rely on saying, well the
19 probabilities are very low, to then just hang your hat
20 on a strictly single deterministic assessment of
21 impact.

22 MR. EASTON: We do do a consequence
23 analysis in 6672 for long duration fires where you get
24 fuel breach cladding and all, and it shows that the
25 release tends to be very low also. So if you linked

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1 the two together.

2 CHAIRMAN RYAN: And that's what I'm
3 asking.

4 MEMBER WEINER: Any staff?

5 MR. SCOTT: Ruth, I've got one.

6 MEMBER WEINER: Mike.

7 MR. SCOTT: Mike Scott, ACNW staff. In
8 one of my previous lives I had the good fortune of
9 working for a nuclear utility that probably has
10 shipped more spent fuel than any other, and we
11 typically would ship it about 100 miles between one
12 place and another, and if I recall correctly and my
13 memory doesn't fail me we would ship two cars at a
14 time. Your assumption was one car, correct?

15 MS. SAMPSON: The -- all of the
16 assumptions for the study are based on a single cask
17 car in the consist, yes.

18 MR. SCOTT: I'm wondering, especially on
19 a cross-country route, it would seem that economics
20 would strongly dictate several more than one at a
21 time. Did that enter into the considerations at all,
22 and what do you think the effects would be on your
23 conclusions?

24 MS. SAMPSON: I believe, and I apologize.
25 In -- let me -- I will answer your question, but let

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1 me -- there is a technical study that supports the
2 report to Congress. The technical study was completed
3 by the VOLPE center and has been submitted to the FRA.
4 However, I do have to apologize. We hoped that it
5 would be available by now. The technical study is
6 still in review process with the FRA. It's not a
7 contents review. Because the study has been worked on
8 for so many years and has been transmitted
9 electronically between Cambridge and Washington, and
10 between various agencies here in Washington, there are
11 several significant editorial problems with the
12 technical study right now. Figure numbers don't match
13 up correctly anymore with the actual figures that
14 they're supposed to correspond to, data has been
15 dropped out of tables, headings are missing. FRA is
16 trying to utilize their resources that have worked
17 with the study over the number of years to do that
18 review of the document and try to get it into a format
19 where it won't have a lot of technical problems with
20 the technical study. And we do hope to have the study
21 available in February of this year, and as soon as it
22 is available we will place it on our website. It does
23 provide a great deal more of the background
24 information. It provides examples of the event trees,
25 and in the actual analysis of each of the six routes

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1 that were reviewed. So it does provide better
2 information.

3 One of the things that was looked at in
4 the technical study, and I don't have it tapped, but
5 there was some consideration given to a two-cask
6 consist, and how that might impact some of the
7 results. It's a much less detailed review, because it
8 was kind of tacked on as we came to the end of the
9 study. The utilization of two casks has some impact,
10 but it's a very minor impact on the results. It
11 really didn't significantly change the findings in any
12 way. There is a little bit of an address of that, and
13 I think your point is very significant. It does not
14 make economic sense to take cask cars across the
15 country one car at a time. It's not an efficient use
16 of resources. Doesn't seem to be, from my opinion.

17 MR. THADANI: I don't really have a
18 question, but a couple of comments probably. The
19 first one, I think that if you do more realistic
20 analysis, at least technically you might conclude that
21 there's essentially no difference in the outcomes.
22 And so one would be then forced to make what I would
23 think would be a policy decision based on perhaps some
24 engineering considerations that you talked about. And
25 then that would make sense.

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1 The second comment that concerns me is
2 when we talk about probabilities that are so low, 10^{-10} , 10^{-15} , whatever it is, then I think one needs to
3 think about the uncertainties. That's what's going to
4 drive whatever decision you're going to make. Because
5 quite honestly those numerical values are not very
6 useful. I'm reminded that perhaps likelihood of a
7 meteorite striking certain parts of the United States
8 is probably higher than some of these estimates. So
9 I just urge caution in the use of these probabilistic
10 estimates. All it tells me is then I have to look for
11 what else can get me in trouble, rather than this
12 particular model I'm looking at. That's it, thank
13 you.
14

15 MEMBER WEINER: Are there any questions or
16 comments from members of the audience? Come up, then
17 and identify yourself.

18 MR. MALSCH: Yes, I'm Marty Malsch. I'm
19 a lawyer with the State of Nevada. I just had two
20 questions. One is what did you assume by way of the
21 rail corridor between the existing lines and Yucca
22 Mountain?

23 MS. SAMPSON: I do not know what the
24 INTERLINE utilized to get to Yucca Mountain since
25 there is not a rail line to there. I don't know the

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1 answer to that.

2 MR. MALSCH: Okay. And then my second
3 question was in doing the comparison you eliminated
4 Category 4 accidents purely on the basis of
5 probability rather than risk. Yet in other categories
6 you're comparing risk across the transportation modes.
7 Why is that?

8 MS. SAMPSON: Again, I apologize. That's
9 a decision that was made at the outset of the study.
10 There was analysis done of rail accidents that had
11 happened utilizing FRA's rail database, and the
12 accident that would result in forces that were
13 equivalent to those identified in the 6672 were not
14 identified in the existing rail database. So it was
15 eliminated. But it was a decision made at the outset
16 of the study.

17 MR. MALSCH: Okay, thank you.

18 MEMBER WEINER: Bob, would you?

19 MR. HALSTEAD: Oh there it is. It's a
20 clamp. Okay, got it. Thank you. Bob Halstead, State
21 of Nevada. I just want to make a comment that we do
22 endorse the conclusion of the report favorable to
23 dedicated trains. I would add to Marty's comment, we
24 were involved in that 1992 workshop. Most of the
25 stakeholders wanted to see the Category 4 rolled in.

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1 I don't want to repeat, although I agree with much of
2 the discussion about the probabilistic analysis, but
3 there's a point here where quantitative analysis
4 doesn't always give you a good handle on whether as a
5 matter of policy giving added assurance that you
6 eliminate the potential for accidents like the
7 Baltimore Tunnel Fire involving spent fuel, there just
8 isn't any really good way to quantify that even though
9 Earl as always has a number to throw on the table for
10 it. I think there are some security advantages that
11 are also very hard to put any kind of a cost-benefit
12 number on.

13 The State of Nevada has a petition for
14 rulemaking, PRM73-10 that has been before the NRC for
15 now going on seven years arguing that use of dedicated
16 trains would be a good idea for security reasons.
17 Congress ordered the GAO to do an assessment of that
18 in 2003. They concluded that that was a good idea.
19 I realize back when you were directed to do this study
20 that wasn't one of the concerns, but since then
21 security issues are involved.

22 And while Nevada has consistently
23 advocated use of dedicated trains, I do want to say
24 we're sensitive to this issue of the train crew dose,
25 and while again I agree with the discussion here that

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1 it's probably pretty low and not a good discriminator
2 between different classes of service, nonetheless it
3 probably would be a good idea, given the concerns on
4 the part of the railroad unions that with the
5 exclusive use dose rate assumed, which would be a
6 higher routine dose rate, it probably would be a good
7 idea to recalculate the train crew doses not to come
8 up with an LCF calculation, but to come up with some
9 number on -- given the expected crew rotations, what
10 are the maximum annual doses to a particular crew, or
11 a particular worker. And I think that goes in line
12 with Dr. Ryan's concern that those collective dose
13 numbers not be misused. Thank you.

14 MS. SAMPSON: I do want to say, the FRA is
15 very aware of concerns raised by the rail unions, the
16 Brotherhood of Locomotive Engineers and Trainmen, and
17 also the United Transportation Union. And we have met
18 with them on several occasions. FRA is currently
19 undertaking a process to try to identify some baseline
20 dose rate information for our rail inspector
21 employees, and we hope to be able to utilize some of
22 that information to assist the railroads in developing
23 their own radiation dosimetry programs if they
24 determine that that would be beneficial to them. It
25 is a concern of the rail workers, and something that

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1 does need to be addressed with them for all modes of,
2 you know, for all routine patrols transportation.

3 MEMBER WEINER: Any further questions?
4 Hearing none I'll turn it back to the chairman.

5 CHAIRMAN RYAN: Thank you, Ruth, and thank
6 you very much again for your presentation and our
7 other fine presentation this morning. Let's see. We
8 are adjourned for lunch until 1 o'clock, and I think
9 after lunch we have just a brief preparation for the
10 Commission briefing. The Commission briefing and then
11 letter-writing. So I believe this will close our
12 formal record for the day. So we'll close the record
13 here, but we will come back to prepare for our
14 Commission briefing at 1 o'clock. Our Commission
15 briefing is scheduled from 2:00 to 4:00 p.m. We'll be
16 in again White Flint 1, the large public meeting room
17 over in the other building. And then we'll reconvene
18 here after the conclusion of the briefing to follow up
19 on this discussion of letters, on what we're going to
20 write. And then I think we're scheduled for first
21 thing Thursday morning to take up the details of the
22 Part 63 letter, and anything else that we decide late
23 in the afternoon. And Ruth's transportation, we'll
24 take that up this afternoon, or afterward. Thursday
25 morning?

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1 MEMBER WEINER: Thursday morning because
2 I want to get it printed.

3 CHAIRMAN RYAN: All right, Thursday
4 morning it is. All right, very good. Thank you all
5 and see you at 1 o'clock.

6 (Whereupon, the foregoing matter went off
7 the record at 11:39 a.m.)

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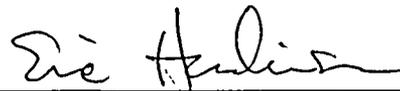
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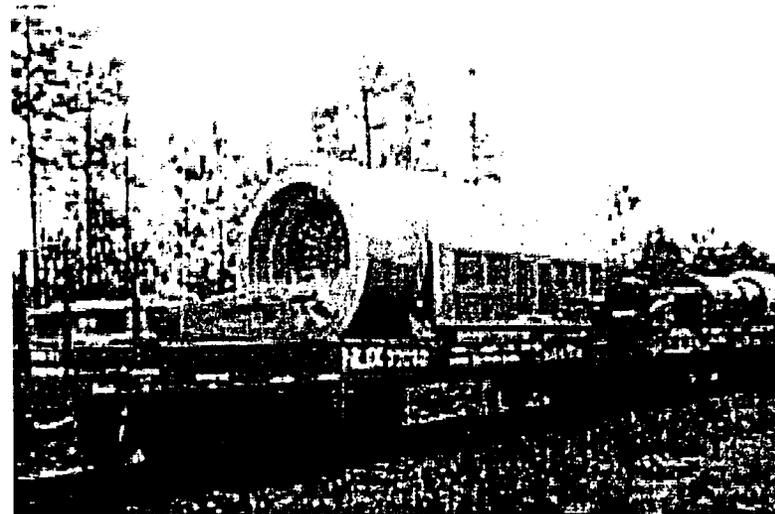
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Use of Dedicated Trains for Transportation of High-Level Radioactive Waste and Spent Nuclear Fuel

Michele Sampson
January 11, 2006



Federal Railroad Administration

Introduction

- History
- Study Methodology
- Findings
- Path Forward

History

- Study mandated by Section 15 of the Hazardous Materials Transportation Uniform Safety Act of 1990
 - Railroad Transportation Study -- comparing the safety of "dedicated trains" to other methods of rail transportation [November 1991]
 - Safe Rail Transport of Certain Radioactive Materials -- taking the findings into consideration when reviewing existing regulations for safe rail transportation [~ December 1992]

History

- Funding appropriated Spring 1992
- FRA requested VOLPE National Transportation Systems Center to conduct the study

History

- VOLPE and FRA held a 2-day workshop in Denver, Colorado September 28 & 29, 1992
 - Representatives of potentially affected States and Native American tribes
 - Railroad industry
 - Potential SNF/HLRW shippers
 - DOE and NRC

History

- 1st Draft dated February 1993
- Review within DOT
- VOLPE revision and updates
- Coordination with DOE and NRC
- Final Report to Congress March '05
- Transmittal to Congress September '05

Study Methodology

Comparative Analysis Inputs

- 3 Types of train service
 - Regular trains
 - Key trains
 - Dedicated trains
- Standardized cask prototype
- Representative routes

Study Methodology

- Regular Train Service
 - Operate at allowable freight track speed
 - Numerous classification yard entries
 - Other hazardous material freight
- Study model
 - Generic 70 car train with the cask consist in the middle of the train

Study Methodology

■ Key Trains

- Based on 2001 AAR Recommended Practice Circular OT-55-D "Recommended Railroad Operating Practices for Transportation of Hazardous Materials"

■ Study model

- Same length/configuration as Regular Train Service
- Same operational environment (yards, passing, HM) as Regular Train Service
- Speed restricted to 50 mph (also analyzed 35 mph)

Study Methodology

- Dedicated Trains

- Study model
 - 6 car length consist, 2 locomotive, 2 buffer cars, cask car and escort car
 - Speed restricted to 50 mph (also analyzed at 35 mph restriction)
 - No passing rule
 - Limited visits to classification yards

Study Methodology

- Cask description
 - 125-ton steel/lead/steel prototype
 - NRC cask certification criteria established the functional strength of the cask
 - NUREG/CR-6672 “Reexamination of Spent Fuel Shipment Risk Estimates” study of the cask without impact limiters used as input for the rail crash analysis

Study Methodology

■ Representative Routes

- 6 routes were chosen by VOLPE/FRA
- Origin points include nuclear power plants and existing waste repositories (SNF or HLRW)
- Destination point DOE's Yucca Mountain facility
- Utilize major east-west rail links
- Representative of geographic location and length
- Links determined by ORNL's Interline routing model, "most likely traveled"

Study Methodology

Route Number	Origin	Length Miles	Average Population Density Persons/sq mile (2000 Census)		
			Urban	Suburban	Rural
1	Humbolt Nuclear Power Plant, CA	1090	6237	1164	26
2	Crystal River Nuclear Power Plant, FL	2988	5641	976	38
3	Dresden Nuclear Power Plant, IL	1920	5169	1006	26
4	River Bend Nuclear Power Plant, LA	2471	4964	919	30
5	Seabrook Nuclear Power Plant, NH	3086	6109	1028	28
6	Hanford Repository, WA	1226	4744	1307	17

Study Methodology

Utilizing the inputs

- Comparison of radiation dose risk
 - Incident-free (normal) transportation
 - Accident conditions
- Operational safety consideration

Study Methodology

Incident-free Transportation

- Calculated using Radtran 5
 - Six representative routes
 - Cask dose rate 10 mrem/hr @ 1M (DOT non-exclusive use limit)
 - Consist description (# cars & position)
 - Service/speed
 - Impacted population
 - Shielding factors

Study Methodology

- Results expressed as population doses (person-rem) and converted into LCF
- Evaluated by
 - Route
 - Service/speed
 - Population type
 - In-transit vs. stops

Study Methodology

Accident-related Risk

- Compared radiological exposure due to accidents
 - Accident involvement probability
 - Accident severity probability
 - Expected consequences

Study Methodology

Regular Train Transportation

- 3 event trees were constructed
 - Movements on mainline track
 - In yards
 - Fire events
- FRA's Railroad Accident Information Reporting System (RAIRS) was used to define and categorize the accident types
- Baseline accident probability calculated for regular train transport 1988-2001 (total # accidents/yr normalized by reported train miles/yr)

Study Methodology

Accident Types:

- Derailment
- Collision (Head-on; Rear-end; Side; Raking; Broken Train; Obstruction)
- Crossing (Highway-Rail; Rail-Rail)
- Other (i.e., Acts of God)
- Fire/Explosive

Accident Severity:

- Mainline & Yard Trees
Impact velocities identified
- Fire Event Tree
Fire intensity & duration

Accident consequences:

- Described in terms of cask damage and resulting radiation exposure

Study Methodology

Key Trains

- Modified event tree to reflect speed restriction and improved braking
- Decreased accident type probability
 - Collision/Obstruction w/speed as a factor
 - Highway-Rail or Rail-Rail Crossing w/speed as a factor

Study Methodology

Dedicated Trains

- Modified event tree to reflect operational restrictions
 - Yard entries; consist length; passing restrictions; speed limits; no HM
- Reductions in accident type probability for all types except those affected by train frequency (No change)

Study Methodology

■ Accident rates

- Overall mainline rate for all accident categories and yard accident rates are the same for Regular and Key service
- Overall mainline accident rate for Dedicated service is $\sim 3.8\%$ less
- Overall yard accident rate for Dedicated service is $\sim 75\%$ less

Study Methodology

Accident Severity Categories

- I – Delay event, no dose rate increase from baseline 10 mrem/hr @ 1M
- II – Accident results in dose rate increase to 1 rem/hr @ 1M, no release
- III– Accident results in loss of shielding/internal damage, dose rate increase to 4.3 rem/hr @ 1M
- IV – Accident results in release of radioactive material. This category was equally unlikely for all shipping options and was not analyzed.

Study Methodology

Accident Consequences

- Calculated using Radtran 5
- Doses to general population, rail workers, and emergency response personnel
 - Category I – a 10 hour delay
 - Category II and III – delays lasting between 3 and 72 hours
- Comparison between Regular/Key and Dedicated Train service

Study Methodology

Operational Safety Considerations

- Reduced time-in-transit and switching operations by avoiding yards
- Reduced derailment/collision potential by use of ECP brakes and uniform consist

Study Methodology

- Fewer mechanical malfunctions by use of dedicated equipment operated in small consists
- Reduced risk from interaction of other hazardous material in the event of derailment/collision
- Potential engineering enhancements to dedicated equipment (on-board defect sensors; utilization of the ECP communication backbone linking cars)

Findings

“The Volpe Study indicates that risk to employees and the public from the transportation of SNF/HLRW is low, but on a comparative basis dedicated trains appear to offer advantages over general consists.”

Available online www.fra.dot.gov under Safety – Publications

“Use of Dedicated Trains for Transportation of High-Level Radioactive Waste and Spent Nuclear Fuel”

Findings – Normal

Route	Service	Total Dose (person-rem)	Latent Cancer Fatalities
1	Regular/Key	0.1316	5.57×10^{-05}
	Dedicated	0.0720	3.10×10^{-05}
2	Regular/Key	0.1949	8.15×10^{-05}
	Dedicated	0.1188	5.03×10^{-05}
3	Regular/Key	0.1528	6.36×10^{-05}
	Dedicated	0.0838	3.54×10^{-05}
4	Regular/Key	0.1684	7.00×10^{-05}
	Dedicated	0.0980	4.13×10^{-05}
5	Regular/Key	0.2094	8.81×10^{-05}
	Dedicated	0.1258	5.40×10^{-05}
6	Regular/Key	0.1223	5.13×10^{-05}
	Dedicated	0.0700	2.98×10^{-05}

Findings - Accident

Event		Regular/Key Service		Dedicated Service	
	Duration (hrs)	Total Dose (person-rem)	Predicted LCF	Total Dose (person-rem)	Predicted LCF
I	10	6.3×10^{-03}	2.62×10^{-06}	6.56×10^{-03}	2.73×10^{-06}
II	10 (D) 16 (R/K)	16.36	6.56×10^{-03}	4.91	1.98×10^{-03}
III	10 (D) 16 (R/K)	70.90	2.81×10^{-02}	21.17	8.52×10^{-03}
IV	Not evaluated				

Finding

- Non-incident risk from the entire shipping campaign, based on the number of rail shipments in DOE's Environmental Impact Statement on Yucca Mountain, is appreciably less than one LCF regardless of type of service.

Path Forward

- Determine if rulemaking is warranted
 - Evaluate cost/benefit data associated with dedicated service
 - Review AAR operating and maintenance standards published post-study
 - Review DOE and industry shipment planning documents
- Review and update FRA's SCOP

**USE OF DEDICATED TRAINS FOR TRANSPORTATION
OF HIGH-LEVEL RADIOACTIVE WASTE
AND SPENT NUCLEAR FUEL**

**Report to the Congress
March 2005**

The Mandate

Section 15 of the Hazardous Materials Transportation Uniform Safety Act of 1990 (Pub. L. No. 101-615), amended section 116 of the Hazardous Materials Transportation Act (49 U.S.C. App. 1813) to read in part as follows:

- (a) **RAILROAD TRANSPORTATION STUDY** - The Secretary, in consultation with the Department of Energy, the Nuclear Regulatory Commission, potentially affected States and Indian tribes, representatives of the railroad transportation industry and shippers of high-level radioactive waste and spent nuclear fuel, shall undertake a study comparing the safety of using trains operated exclusively for transporting high level radioactive waste and spent nuclear fuel (hereinafter in this section referred to as 'dedicated trains') with the safety of using other methods of rail transportation for such purposes. The Secretary shall report the results of the study to Congress not later than one year after the date of enactment of this section.
- (b) **SAFE RAIL TRANSPORT OF CERTAIN RADIOACTIVE MATERIALS.** -Within 24 months after the date of enactment of this section, taking into consideration the findings of the study conducted pursuant to subsection (a), the Secretary shall amend existing regulations as the Secretary deems appropriate to provide for the safe transportation by rail of high-level radioactive waste and spent nuclear fuel by various methods of rail transportation, including by dedicated train.

Executive Summary

This report compares the relative safety of rail shipment alternatives for the transport of spent nuclear fuel (SNF) and high-level radioactive waste (HLRW). These alternatives involve the use of: (1) regular trains: operating without restrictions with the exception of current hazardous materials and rail safety regulations; (2) key trains: similar to regular trains but operating with a maximum speed limit of 50 miles per hour (mph) or 80.4 kilometers per hour (km/hr) and other handling restrictions; and (3) dedicated trains: operating with a maximum speed limit of 50 mph (80.4 km/hr) and additional operating restrictions.

In preparation for this report, the U.S. Department of Transportation's (DOT) Volpe National Transportation Systems Center (Volpe), a part of the DOT Research and Innovative Technologies Administration (RITA), under contract to the DOT Federal Railroad Administration (FRA), performed a study to provide a safety analysis on whether the FRA should require carriers to use dedicated trains for shipment of SNF and HLRW (Volpe Study). In preparation for this report, FRA preliminarily considered the relative cost implications of using dedicated trains and the additional opportunities for risk reduction associated with use of dedicated rolling stock.

The study was initiated once funding was appropriated for it in the Spring of 1992. Representatives from the Department of Energy (DOE), the Nuclear Regulatory Commission (NRC), potentially affected States and Native American tribes, the railroad industry, and SNF/HLRW shippers were invited to attend and consult with the FRA and the study contractor at a 2-day Dedicated Train Workshop held in Denver, Colorado, in September 1992.

In preparing this report, FRA coordinated closely with the DOT Pipeline and Hazardous Materials Safety Administration (PHMSA), which also issues regulations governing transportation of hazardous materials in all modes,¹ and with the DOT Office of the Secretary. In addition, FRA consulted with DOE and NRC. Although comments from other governmental agencies were incorporated, this report is ultimately the responsibility of the DOT.

As more fully explained later in this report, the transportation of SNF/HLRW is thoroughly regulated, and several agencies of government play active, highly coordinated roles in endeavoring to ensure its safety. Over the past 45 years, approximately 600 train movements of these materials have occurred by rail without any incidents occurring that

¹ FRA, in concert with PHMSA, develops hazardous materials regulations specifically applicable to the rail mode for issuance by PHMSA. FRA enforces hazardous materials regulations applicable to transportation by rail. Both agencies act by delegation from the Secretary of Transportation. Actions referred to in this report where PHMSA is referenced were taken by the Research and Special Programs Administration (RSPA). The PHMSA, created by P.L. 108-427, is the successor organization to RSPA for DOT's hazardous materials transportation and pipeline safety responsibilities and did not yet exist for purposes of this report.

have affected the integrity of the shipping package. At the discretion of the shipper/carrier parties involved, the majority of these shipments were made using "special" or dedicated trains.² The responsible agencies work to continually verify the safety of packaging, rolling stock, and procedures, and the training of personnel involved in transportation. The railroad industry also issued its own standard for movement of these commodities, that seeks to establish performance guidelines for a cask/car/train system transporting high-level radioactive material. These guidelines are designed to ensure safe transportation, minimize time in transit, and incorporate best available technology to minimize the potential for a rail accident.³ This report addresses one additional means by which a greater level of safety might be achieved, the use of dedicated trains.

The Volpe Study analyzed both non-incident risk from radiation emitted from the cask during transportation and accident risk. Non-incident risk from the entire future shipping campaign is estimated to be on the order of approximately one (1) latent cancer fatality (LCF) for every 40,000 shipments in non-dedicated trains and approximately one (1) LCF for every 50,000 shipments in dedicated trains. Using the number of rail shipments expected over the life of the shipping campaign, as stated in DOE's Environmental Impact Statement on Yucca Mountain as a measure, the potential expected LCF's would be appreciably less than one. Therefore, regardless of the type of train, the potential exposures are essentially benign when compared to a lifetime of normal background radiation exposure from the sun or heightened radiation exposure from flying in a commercial airliner at 30,000 feet. The potential exposures are also benign when compared to radiation risks associated with smoking tobacco. However, given public interest in the subject matter, the basis for these estimates is set forth below. As the results show, if there is a discernable difference in risk for affected populations, the risk is less using a dedicated train.

With respect to accident risk, safeguards are already in place — principally NRC package certification requirements, railroad industry key train requirements, and FRA's focused inspection program — that have reduced the potential, to an extremely low probability, that a cask could be damaged in rail transportation to the extent it might release radioactive material into the environment. However, further reducing the possibility of a train accident involving a SNF/HLRW cask is highly desirable, despite the very low probability that the cask might be compromised. It is also recognized that any train accident involving a cask shipment would degrade public confidence in the ability to safely transport this material, and the presence of a cask would greatly complicate emergency response and wreck clearance operations, thus compounding costs to responders and the railroad.

² As used in this report a special or dedicated train is a train that consists only of equipment and lading associated with the transportation of SNF/HLRW. That is, the train consists only of necessary motive power, buffer cars and cask car or cars, together with a car for escort personnel. Such a train does not transport other rail rolling stock or other revenue or company freight.

³ Association of American Railroads (AAR) Standard S-2043: Performance Standard for Trains Used to Haul High Level Radioactive Material; AAR Circular Letter C-9619 dated April 29, 2003.

Importantly, the study results support the conclusion that use of dedicated trains would reduce both the probability of a SNF/HLRW cask being involved in a train accident and the possibility that other hazardous materials might be involved that could subject a cask to a fire environment with possible loss of shielding. Although the study intentionally uses worst-case assumptions (e.g., minimum compliance with NRC fire exposure criteria) and should not be taken as an absolute measure of risk, on a comparative basis, it is apparent that a dedicated train strategy should have a favorable impact on any residual risk.

As the Volpe Center was finalizing the study effort underlying this report, FRA's Office of Safety, in concert with the Office of Railroad Development, was reviewing informally the economic and other practical issues associated with this public policy decision. Appropriate train make-up and the value of rolling stock that incorporates the latest lessons in derailment prevention and most advanced technology are clearly important. FRA also recognizes the improvements in quality and efficiency of inspection by the railroad and FRA that can be realized through use of dedicated consists. FRA further recognizes the utility of enhanced operating procedures and training that could further reduce the potential for collision or derailment. The risk of an accident that seriously compromises a cask is extremely small under current conditions. Avoiding any accident that gives rise to a concern over cask integrity should heighten public confidence in the ability to safely transport SNF and HLRW and hold down the cost of emergency response related to any events where the circumstances suggest the need for caution.

FRA preliminarily explored whether use of dedicated trains would result in higher costs to shippers or railroads, and found that use of special trains is, de facto, the current reality. Railroads cannot afford the disruption associated with any event involving apparent or possible compromise of an SNF/HLRW shipment. Shippers seek to use escort personnel efficiently, and having their cars switched en route degrades this efficiency, particularly given terminal dwell times for normal freight that often exceed 24 hours. FRA's own safety program for these shipments is greatly simplified by use of special trains and would be further simplified to the extent particular rolling stock is dedicated to this purpose. Accordingly, preliminary analysis suggests that overall costs to society by using dedicated trains is not materially in excess of those costs for general revenue trains or key trains. In concert with RSPA, FRA will further extend and refine this analysis in the coming months and will make a final determination regarding the need for further rulemaking regarding conditions of transportation for these materials.

FRA is aware that post-9/11, security looms large as a concern for all forms of transportation. Although this report does not address security issues in detail, FRA is aware that NRC and DOE are considering the security ramifications of this issue. At the same time, DOT is working with the Department of Homeland Security (DHS) on the wider scope of security for the transportation of all regulated hazardous materials, of which SNF/HLRW is but one area. Based upon FRA's general knowledge of the rail environment and information available to the agency as a result of its efforts with industry and other agencies of government, use of dedicated trains should enhance security for transportation of the SNF/HLRW. Dedicated trains will be provided priority

on the railroad and will be routed more directly to a destination with a minimum of interruptions to the journey. Security arrangements along the route can be executed with greater precision because the routing and scheduling will be more certain. Accordingly, while this report does not make final judgments regarding the role of dedicated trains in the security of these shipments, neither does FRA discern any reason why security concerns should be in conflict with the use of dedicated trains; and there may be significant synergy.

Background

SNF is fuel that has been withdrawn from a nuclear reactor following irradiation and has undergone at least one year's decay since being used as a source of energy in a power reactor. Further, reprocessing has not separated the constituent elements of SNF. This fuel includes: (1) intact, non-defective fuel assemblies; (2) failed fuel assemblies in canisters; (3) fuel assemblies in canisters; (4) consolidated fuel rods in canisters; (5) non-fuel components inserted in pressurized water reactor fuel assemblies; (6) fuel channels attached to boiling water reactor fuel assemblies; and (7) non-fuel components and structural parts of assemblies in canisters [42 U.S.C. § 10101(23), 40 CFR 191.02 and DOE Order 5820.2A].

HLRW results from the reprocessing of SNF in a commercial or defense facility. It includes liquid waste produced directly in reprocessing and any solid waste derived from the liquid that contains a combination of transuranic waste and fission products in concentrations requiring permanent isolation [42 U.S.C. § 10101(12), 10 CFR Part 72.3 and DOE Order 5820.2A]. HLRW meeting this definition has been shipped by modes other than rail.

SNF and HLRW are required to be transported in casks constructed to NRC requirements. Casks are secured to specially constructed rail cars capable of transporting the heavy load.⁴ This study assumes that the cask car(s) will be surrounded by two buffer cars and accompanied by an escort car. This complement of cars is referred to as the cask consist. A dedicated train is comprised of the cask consist and multiple locomotives. A regular or key train will include the cask consist, locomotive(s), along with any number of additional cars potentially containing other regulated hazardous materials, various other general cargo and/or empty rail cars.

Regular trains typically operate at allowable freight track speed, make numerous classification yard entries, and adhere to hazardous materials transportation regulations when transporting any regulated hazardous material, including SNF and HLRW. Since it was not possible to analyze all possible consist and operational arrangements of regular

⁴ A typical cask assembly weighs about 250,000 pounds, and a loaded cask car weighs about 394,500 pounds, in contrast to a typical rail load of 286,000 pounds. Like other cars constructed to carry heavy loads, cask cars use additional axles and span bolsters to distribute the weight over a larger portion of the track structure. Other special loads transported on the railroad include large transformers and specialized industrial equipment.

trains within the confines of this study, the model consisted of a generic regular train of 70 cars, with the cask consist in the middle of the train.⁵

In 2001, the Association of American Railroads (AAR) issued a Recommended Practice Circular defining any consist containing SNF or HLRW as a Key Train and routes with specified levels of hazardous materials including SNF and HLRW as Key Routes.⁶ Key trains are similar to regular trains in length and general operating rules except for the following:

- No consist restriction in excess of current regulatory requirements
- Cask is placed on a flatcar between two buffer cars
- Train has a railcar with escort personnel aboard who monitor/guard the shipment
- A 50 mph (80.4 km/hr) speed restriction
- Passing not restricted unless on lower than Class 2 Track
- All cars in the consist are equipped with roller bearings with rules about alarms
- Key Routes have hot bearing detection equipment at minimum intervals and the track must be inspected twice annually for internal flaws and geometry irregularities.

In the Volpe Study, by contrast, dedicated trains were assumed to operate according to the following:

- Consist is restricted - no freight other than SNF and/or HLRW is carried
- Cask is placed on a specially designed and equipped flatcar between two buffer cars
- Multiple locomotives
- Train has a railcar with escort personnel aboard who monitor/guard the shipment
- A 50-mph (80.4 km/hr) speed restriction. For completeness a 35 mph (56.3 km/hr) speed restriction was also analyzed although this restriction no longer applies since the publication of AAR circular OT-55-D
- Passing is restricted on all track classes-when a dedicated train is passed by another train, one of the trains remains still while the other train passes at a speed less than or equal to 50 mph (80.4 km/hr). Again, for completeness a 35-mph (56.3 km/hr) speed was also analyzed.

Between 1979 and 1997, there were over 1,300 shipments of commercial SNF and HLRW totaling over 1,102 tons (1,000 metric tons). Although only about 11 percent of the shipments were by rail, these accounted for over 75 percent of the tonnage [NRC,

⁵ FRA does not mandate specific placement of loaded and empty cars in trains except in the case of placarded cars carrying regulated hazardous materials in accordance with 49 CFR 174.85. However, industry guidelines and carrier rules exist to address train make-up in light of joint industry-government research. From the point of view of train-track dynamics, a heavy vehicle such as a cask car would typically require placement in the first third of the train.

⁶ AAR Recommended Practice Circular OT-55D, Recommended Railroad Operating Practices for Transportation of Hazardous Materials, 2001.

1998].⁷ To date, there have also been approximately 800 shipments of naval SNF and HLRW safely made in both regular trains and dedicated trains. In the future, DOE estimates that a total of between 11,000 and 17,000 casks of SNF and HLRW will need to be shipped by rail [DOE, 2002b].⁸ A shipment by rail can consist of a single movement of a single cask or a single movement of multiple casks with escort and buffer cars, as needed.

Safety Compliance Oversight

Regulations addressing hazard communication, training, security plans, packaging and modal operational requirements for transporting regulated hazardous materials, which includes SNF and HLRW, exist in 49 CFR Parts 100-185 (Hazardous Materials Regulations). Rail safety regulations in 49 CFR Parts 200-244 address safety requirements for railroad operations, including, for example: rail equipment, track, signal systems, communications, train crews, and grade crossings. These rail safety regulations apply regardless of whether there is any hazardous material being transported in a train.

The nation's rail carriers conduct their own inspections in their efforts to ensure compliance with all applicable regulations. The FRA and participating State agencies that have FRA Certified State inspectors continually use the resources available to them to the extent possible to conduct inspections of the nation's rail carriers and to ensure that regulatory compliance is being achieved.

In addition to these efforts, the FRA developed and implemented the Safety Compliance Oversight Plan (SCOP),⁹ a coordination and inspection plan specific to all known rail shipments of SNF and HLRW. Implementation of the SCOP focuses available resources in order to ensure the safe and secure transportation of SNF and HLRW. The SCOP addresses what tasks the FRA and its FRA certified State inspection partners will perform for shipments of SNF and HLRW. The tasks cover all operational aspects of the rail transportation environment, as well as planning and coordination tasks with entities and agencies involved in the transportation of this material.

To date FRA has implemented the SCOP for each movement due to the infrequency of these shipments. However, FRA recognizes that as shipments "ramp up," which could be as early as 2007, it will become increasingly difficult to implement the SCOP tasks in their entirety as they currently exist for every shipment. Congress has recognized the

⁷ U.S. Nuclear Regulatory Commission. "Public Information Circular for Shipments of Irradiated Reactor Fuel." Washington, D.C.: NUREG-0725 Rev 13. October 1998.

⁸ U.S. Department of Energy. "Final Environmental Impact Statement for a Geological Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada." Washington, D.C.: Office of Civilian Radioactive Waste Management, DOE/EIS-0250 Vol. I and II. February 2002.

⁹ FRA's Safety Compliance Oversight Plan (SCOP), can be viewed and downloaded from FRA's web site at www.fra.gov/downloads/safety/scopfnl.pdf

importance of ensuring that shipments of SNF and HLRW move safely and securely and provided FRA with the ability to add inspection personnel via the budget process. Regardless of the type of train used for this function, FRA and participating State agencies will continue to facilitate the safest possible transportation of SNF/HLRW by enforcing the railroad safety laws and regulations, and the Hazardous Materials Regulations. However, it is evident that FRA's task in this regard is greatly simplified and the likelihood of success is enhanced, where dedicated equipment is employed and the route is as direct and well suited to the mission as possible. Concentrating on the safety of a discrete subset of locomotives and cars, and surveying a route that avoids congested yards, will increase the likelihood that safety concerns are reliably identified and remedied before the shipment is accepted by the railroad.

Comparative Risk Assessment

The Volpe Study assumed two basic types of risks involved with transporting SNF and HLRW: (1) incident-free risks and (2) accident-related risks. The incident-free risks associated with normal emissions of very low radiation doses from the cask involved absolute risks of appreciably less than one LCF for the entire exposed population for the highest risk case—the regular train-over an entire shipping campaign. Primarily because of the reduced time in transportation, incident-free risk was lowest for dedicated trains (again appreciably less than one LCF for the shipping campaign). These estimates are higher than would be realized in actuality, as they assume the maximum allowed emissions from the casks in non-exclusive use transportation, rather than the generally lower emissions from actual shipments.¹⁰

Incident-free risks result from continuous emissions of low doses of radiation, which the cask shielding cannot totally contain. However, the emissions can and are limited to acceptable safe levels (a maximum of 10 millirems per hour (mrem/hr) at 3.3 feet (1 meter) from the surface of the package [49 CFR 173.441]). All individuals exposed to the radiation being emitted from the cask during transport, handling, loading and unloading are exposed to very low doses of incident-free radiation.

Accident-related risks result from the potential of exposure to radiation after an accident occurs. Radiological consequences were calculated for accidents where consequences vary with the use of a regular, key, or dedicated train service. For each accident type, incident durations from 3 to 72 hours were analyzed to account for a range of severities, and three locations types, urban, suburban, and rural, were analyzed. For the purposes of this study, accidents were broken down into four severity categories:

¹⁰ Prior to proffering a cask for shipment, the shipper must demonstrate compliance of the cask design with 10 CFR Part 71, as promulgated by the NRC. Experience has shown that radiation levels emitted by the package are generally below the maximum allowed by regulation for non-exclusive use shipments due to the shielding built into the packages and the efforts of the shipper to reduce the external radiation levels to be as low as possible. In addition, radiation levels are checked by State and Federal Government agencies prior to being offered into transportation and can also be monitored while in transportation. FRA recently secured additional staff to support this function.

- Category I Delay event - accident well within the Hypothetical Accident Conditions (HAC) modeled by the cask packaging test criteria of 10 CFR Part 71; dose rate assumed equivalent to the allowed non-exclusive use transport rate of 10 mrem/hr at 3.3 feet (1 m) from the cask surface. Accidents in Category I could result in an increased duration of exposure to certain individuals (such as crew and nearby population) due to the extended time required to clear the wreck scene and resume transport.
- Category II Serious accident - an accident close to the HAC, which could result in a hundredfold increase in radiation levels but no release of radioactive material occurs. The dose rate is assumed equal to 1 rem/hr (1,000 mrem/hr) at 3.3 feet (1 m) from the cask surface. Accidents in Category II could expose populations to higher doses of radiation for extended time periods.
- Category III Major accident - an accident that generates forces or temperatures that exceed the HAC. A greater loss of shielding or internal damage occurs but there is no release of radioactive material. The dose rate is assumed to be equal to 4.3 rem/hr (4,300 mrem/hr) at 3.3 feet (1 m) from the cask surface. Accidents in Category III could expose populations to higher doses of radiation for extended time periods.
- Category IV Severe accident - an accident resulting in forces or temperatures well in excess of the HAC. A significant loss of shielding or cask damage resulting in the release of some radioactive material. This category was not analyzed as it was considered equally unlikely for any of the shipping options and the consequences would not be substantially different.

The consequences of any of these four types of accidents are determined by: the environment in which the accident occurred; the potential for a second "event" such as a fire following the initial impact, puncture, or fall; and the time required to respond to the accident.

Incident-free and accident-related risks are analyzed for entire populations, and results are expressed as population doses (person-rem). These population doses are also converted into an estimate of health effects, i.e., LCFs. Doses for individuals (where applicable and possible) are expressed in units of millirem (mrem).

The use of LCF as a metric of deleterious health effect is based upon the assumption that any amount of radiation exposure may pose some risk. This is the linear, no-threshold (LNT) model, in which any increase in dose has an incremental increase in the risk of occurrence of cancer. LNT is the accepted model used in the U.S. as well as by international radiation protection bodies. The LCF rate for worker population is 0.0004,

while that for the general population is 0.0005 [NCRP 1993].¹¹ When the rates are applied to an individual, the units are for a lifetime probability of LCFs per rem (or 1,000 mrem) of radiation dose. When the rates are applied towards a population of individuals, the units are excess number of cancers per person-rem of radiation dose. The difference between the worker dose and the general public risk is attributable to the fact that the general population includes more individuals in sensitive age groups (that is, less than 18 years of age and over 65 years of age).

Calculating Risk

The total risk associated with transporting SNF and HLRW is the result of both incident-free risk and accident-related risk. The amount of the low-level exposure associated with Incident-free transport depends on the details of the number of shipments, specific routes and operating variations. Accident risks are associated with relatively low probability events. The accident probabilities are based on historical accident data independent of a specific route or location. Incident-free and accident-related risks of radiological exposure are calculated independently for regular, key, or dedicated train service. The results from these calculations are then compared against commonly accepted radiological exposures to put the calculated risk into perspective.

Incident-Free Risk

"Incident-free risk" involves calculating the total expected radiation dose to the public and other impacted populations for specific routes, assuming no accidents, and comparing that calculation to the incident-free risk for regular, key, and dedicated trains. A radiation level of 10 mrem/hr measured at 3.3 feet (1 m) from the package surface was used to calculate population exposures; this is the maximum level for radioactive material packages in non-exclusive use service. The results are also compared to the radiation received by a passenger on a four-hour airline flight. Regulations in 49 CFR 173.441 for exclusive-use shipments do allow for higher radiation levels to exist both at the package surface and at one meter from the package, and yet still allow the package to be transported, but only if additional safety measures are implemented. Experience with shipments of SNF and HLRW to date have shown the radiation levels are well within the prescribed lower regulatory limits for non-exclusive use shipments, and therefore are the norm.

Though SNF/HLRW casks are very well shielded by design, they continuously emit low levels of radiation throughout all phases of transportation. Hence, radiation exposure to crew, handlers, yard personnel, and the wayside population occurs even in the event that an accident does not occur. Therefore the probability of exposure is equal to one. The exposure of all affected populations during regular transport is defined as the incident-free risk. The radiological consequences of SNF/HLRW shipments are a function of the selected route, the cask design and material being transported, the size of the impacted

¹¹ National Council on Radiation Protection and Measurement (NCRP). "Limitation of Exposure to Ionizing Radiation." Bethesda, MD: NCRP Report No. 116, 1993.

populations, the population distance from the cask, the total exposure time, and the amount of shielding between the cask and the impacted populations.

RADTRAN 5, a set of computer models for the analysis of the consequences and risks of radioactive material transport, was used to calculate the incident-free risk. The package dose rate and the package-specific characteristics are used to model the transport cask as a point source for extended distances. For shorter distances, within two characteristic lengths of the cask, the package is treated as a line source. The transportation system characteristics are incorporated into a rail-specific model, with input parameters for population along the route and at stops, vehicle velocity and stop duration. The population density is defined by the user along each route segment. Inputs include the specific characteristics of sub-populations like the number of passengers, crews, and rail workers. The general population is broken into three sub-groups: urban, suburban, and rural.

The calculations were conducted for in-transit exposures (off-link and on-link) and exposures at stops. Off-link doses are defined as those received by persons on the ground within 875 yards (800 m) of a passing train. On-link doses are defined as doses received by persons on passing trains as well as by the escorts and crews onboard the cask-carrying train. Stop doses were calculated as doses received by persons on the ground as well as crew and escorts within 875 yards (800 m) of the train during a stop.

Six routes were chosen for analysis. These routes were chosen to cover a representative number of origination locations across the country with currently operating nuclear power plants or waste repositories that handle SNF or HLRW. The presumed destination point for all routes is Yucca Mountain in Nevada. Table 1 provides a breakdown of the length of each route as well as the associated average population densities along each route broken down into urban, suburban, and rural sub-groups. The selected routes are likely candidates and are representative in terms of their geographic location and length.

There are many designs and sizes of casks for transporting SNF and HLRW. For purposes of this study, it is assumed that the cask will be a large 125-ton (113-metric ton) multi-purpose rail cask [DOE, 1993].¹² The incident-free dose rate was taken as 10 mrem/hr at 3.3 feet (1 m). As described above the transport cask emission rate was modeled as either a point source or a line source depending on the distance of the exposed population from the transport cask.

¹² U.S. Department of Energy. MPS Conceptual Design. Draft 1993.

Table 1. Routes Used in the Analysis

Route Number	Origin	Length	Average Population Density Persons/sq mile (persons/sq km)		
			miles (km)	Urban	Suburban
1	Humboldt Nuclear Power Plant, CA	1,090 (1,754)	6,237 (2,408)	1,164 (449)	26 (10)
2	Crystal River Nuclear Power Plant, FL	2,988 (4,809)	5,641 (2,178)	976 (377)	38 (15)
3	Dresden Nuclear Power Plant Dock, IL	1,920 (3,090)	5,169 (1,996)	1,006 (389)	26 (10)
4	River Bend Nuclear Power Plant, LA	2,471 (3,977)	4,964 (1,917)	919 (355)	30 (12)
5	Seabrook Nuclear Power Plant, NH	3,086 (4,966)	6,109 (2,359)	1,028 (397)	28 (11)
6	Hanford Repository, WA	1,226 (1,973)	4,744 (1,832)	1,307 (505)	17 (7)

Source: 2000 U.S. Census

The exposed populations were broken down into the following categories:

- General population - individuals residing and working near rail lines (waysides) over which the cask passes as well as people who live near yards and sidings where the cask consist may stop temporarily
- Persons on trains sharing the route of the shipment
- Vehicle occupants at grade crossings along the shipment route
- Train crew located in the lead locomotive on the train transporting the SNF/HLRW
- Escorts on the train transporting the SNF/HLRW
- Railroad personnel who work in close proximity to the cask in classification yards and inspect the train at various points
- Other rail yard workers not in close proximity of the shipment.

Each of the different groups experience different exposure levels and durations. Wayside populations and passengers on passing trains will be exposed as the shipment passes. High-resolution population data was used from the 2000 U.S. Census to allocate population density along the length of each route in a one-mile wide corridor. Greater exposure will be calculated for longer routes that are highly populated. This is because exposure time is the determining factor in the amount of radiation members of a population group receive. Time spent near both moving and standing shipments affect exposure. Train operational restrictions such as train speed and run through operations impact exposure time both at stops and in transit.

The train density and train occupancy data derived from the Rail Garrison¹³ network studies were used to assign the number of persons likely to be sharing the railway with the shipment. The average passenger train density was used for the three general population sub-groups: urban at 0.4 trains/hr, suburban at 0.2 trains/hr, and rural at 0.14 trains/hr. The weighted average train speed for each type of train is the determining parameter for exposure. The faster the trains are allowed to travel, the shorter the exposure time.

Vehicle occupants at grade crossings on each side of the railroad can be exposed to emissions from passing shipments. The exposure to this sub-population was split into two different calculations: one for the general sub-population and the second for cars within a prescribed distance to the passing shipment. For the purposes of this study it was assumed that five vehicles would be occupying either side of the track during the passing of a shipment.

Members of the train crew and escorts are exposed for the full duration of the shipment and therefore experience the highest exposure levels of any sub-population. The exposures for these sub-populations are governed by distance from the source, length of route, and stops. Crew members on regular or key trains have the advantage of being further away from the cask consist than those on dedicated trains. However, the position of the escorts on any train type is the same.

During stops at yards or sidings, other railroad personnel will be exposed for the duration of the stop. Since train stops usually occur at rail yards, the population in and near a rail yard is modeled as a uniformly distributed population and the dose is integrated over this population. For rail stops, the public dose was calculated using the suburban population density. Greater exposure occurs for longer stop times and along routes that have more stops.

Exposure time for incident-free risk is determined by train speed, whether run-through operations are allowed, and the number of stops required at yards or sidings. The speed restrictions on the key and dedicated trains increase in-transit exposure time when compared to regular trains. However, the difference is greatly affected by such factors as the class of track over which the shipment traverses. Higher track classes allow for greater train speeds.

The last critical factor associated with exposure is the type of shielding factor that is applied to the various sub-populations to determine gamma radiation attenuation (absorption by physical structures). For the general wayside population different shielding factors were applied depending on the population density. Rural populations were assigned a shielding value of 1.0, which corresponds to no shielding. Suburban

¹³ Peacekeeper Rail Garrison Program, Rail Network Database developed by Earth Technology Corporation for the Department of the Air Force. Network not publicly available but similar network data available from National 1:100,000 scale Rail Network, distributed on the National Transportation Atlas Database produced by the Bureau of Transportation Statistics (BTS)

populations were assigned a shielding factor of 0.87 because of the presence of closely spaced structures generally constructed from wood and cinderblocks. The urban population had the highest shielding factor of 0.018 due to the concentration of buildings constructed from concrete and steel. Occupants at grade crossings, train passengers, escorts, and inspectors/handlers were assigned a shielding factor of 1.0 (no shielding). Crewmembers were assigned a shielding factor of 0.5 assuming that the intermediate locomotive(s) provides gamma radiation attenuation. General yard workers were assigned a shielding factor of 0.1 due to the mitigating effects of gamma radiation attenuation by rail cars and structures in the rail yard. The suburban shielding factor was used for the general population for all stops.

Risk to all population groups is strictly a function of the period of exposure, distance from the cask and the assumed level of shielding provided by intervening equipment or buildings. Transit time and time in yards becomes a major determinant when comparing service options.

Accident-Related Risk

"Accident-related risk" involves comparing the radiological exposure due to accidents with that for regular, key, and dedicated train service by using three components: accident involvement probability, accident severity probability, and expected consequences.

Accident-related risk is the second form of risk associated with the transport of SNF and HLRW along the national rail corridors between originations and final destination. Aggregate accident-related exposure is not calculated; aggregate accident probabilities, not specific to routes, are calculated. Potential accident related exposure is examined by predicting the accident likelihood for the three rail transport methods, and then assigning radiological consequences, broken down into four severity categories. The baseline accident probability is calculated for regular train transport using historical accident data from 1988 to 2001. Dividing the total number of accidents by reported train miles for each year normalized these historical accident rates. The rates were then adjusted to reflect the special constraints associated with key and dedicated trains.

Event schematic "trees" based on these probabilities were then constructed that show the probability of any mainline or yard accident for regular train service. During this 1988-2001 period the number of train miles varied from year to year but generally has risen. A long period was chosen to help determine the probability of extremely rare events such as major fires or high-speed collisions. The variation in accident probability in terms of train miles is not expected to noticeably change with the addition of dedicated trains in the future. Changes in operating practices and improvements in equipment and infrastructure maintenance should reduce these rates. For this analysis, the accident probability is assumed to be constant, as reflected by the event trees. These trees were then modified to reflect the effect of key and dedicated trains on accident probabilities. Aside from speed limits, the dedicated train modifications included operational restrictions, consist limits, and reduced visits to yards.

Radiological-related risks from accidents are based upon the following factors: the design of the cask and its ability to withstand mechanical, thermal, and combined mechanical and thermal accident loads, the likely level of loss-of-shielding (LOS) resulting from accident loads, and the effect of that radiation on crews, escorts, emergency response personnel and the general population surrounding an accident site.

A key assumption in the analysis was the response of the generic cask design. Analysis results were taken from a Sandia National Laboratories study performed on a bare cask with no impact limiters, impacting surfaces with varying hardness, at a range of impact speeds and in different orientations. Force-crush characteristics were taken from that study for the hypothetical 125-ton (113-metric ton) steel-lead-steel cask. These characteristics were then used as inputs into a simplified collision dynamics model to investigate residual cask impact speeds for secondary impacts. The conservative assumption was made that any impacts in the rail environment would be considered as impacts into a hard but not unyielding surface. The speed equivalent of the NRC required package certification HAC drop test criteria in 10 CFR Part 71 onto an essentially unyielding planar surface has been determined to be 30 mph.

There is substantial kinetic energy associated with a train in the event of a collision or derailment. This energy must be dissipated through various mechanisms prior to the train coming to a complete stop. Energy consumption through plastic deformations of colliding objects, plowing of rails and ballast, and emergency braking are only a few ways that the collision energy is absorbed. Of concern for this analysis is the consumption of energy through plastic deformations of rail equipment and the cask. Two collision types were studied: a primary impact against a heavy freight locomotive, and a subsequent secondary impact against the surrounding infrastructure or environment.

A transport cask impact with a heavy freight locomotive was chosen as a representative example of a worst case primary impact in the rail environment. Two impact load paths were assumed for crush of a generic freight locomotive. Using each crush trajectory, force-crush characteristics were developed based upon previous crashworthiness work. The force-crush characteristics of both the transport cask and the freight locomotive were used to establish LOS from a direct impact of the cask with a locomotive. LOS addresses the extent or degree that a SNF/HLRW cask may experience alteration of the radiation shielding component of the cask package, potentially resulting in increased radiation fields outside the cask package envelope. It was determined that cask damage could not occur for primary impacts with a heavy freight locomotive.

The second collision type studied was secondary impact of bare transport casks, without force limiters with the surrounding rail environment. The cask residual speed after a primary impact at various cask orientations and speeds was calculated for the following classes of collisions: head-on, rear-end, rail-rail crossings, and raking/corner impacts. Calculations were performed to determine scenarios where residual cask speeds exceeded the required NRC package certification drop test speed equivalent. This information was then used to estimate the accident consequences for the four severity categories.

Three event trees were constructed for regular train service: one for mainline incidents, one for yard incidents, and one for fires. Fires are treated independently, because they can be initiating events or a secondary event following one of the other accident scenarios. The distinction between mainline and yard accidents is made to account for the significant difference in the number of yard entries made by a regular/key train versus a dedicated train. There is a significant decrease in accident probability that results from this operational distinction. This information is used when modifying the accident rates for dedicated trains.

Each event tree begins with the overall train accident rate per train mile based upon the historical accident review. Accidents are further sub-divided into the following categories: collision, derailment, highway-rail grade crossing, fires/explosions, and miscellaneous. The probabilities for these sub-accident distinctions are reflected in the second level nodes on the event tree. These sub-accidents can result in a derailment, so the probability of a subsequent derailment is also calculated. Accident severity is calculated using the range of speeds that the derailment occurs at and is broken down into the four severity categories. The severity category is based upon the comparison of the final derailment speed to the required NRC package certification drop test speed equivalent.

Study Results

Incident-Free Risk

The total exposure during incident-free transport of SNF and HLRW is extremely low for all train service types (regular, key, and dedicated). In all of the examined representative routes, the expected number of LCFs incurred by any type of train service is less than one (1) for the total estimated number of shipments over the entire projected DOE shipping campaign.

The magnitude of radiation dosage to any population in incident-free shipping of SNF and HLRW is dependent on the total exposure time and the distance from the shipping cask. Exposure time, therefore, is heavily influenced by the amount of stop time (mostly in rail yards) and the amount of time the shipment is in transit.

Although all train service types have extremely low dose levels, there are measurable differences in radiological exposure due to the service type. Regular and key train service would result in higher potential doses to the general public, with estimates of 0.0235 person-rem to 0.0495 person-rem per single cask shipment. This translates into LCF estimates of 1.17×10^{-5} to 2.48×10^{-5} per single cask shipment; in the worst case, this is roughly one LCF for every 40,000 shipments. The DOE estimates that there are approximately 11,000 to 17,000 waste packages to be shipped by rail over the entire campaign [DOE 2002b]. Dedicated trains reduce this exposure range to 0.0177 person-rem to 0.0364 person-rem per shipment, or 8.85×10^{-6} to 1.82×10^{-5} LCF. The highest range of this estimate corresponds to approximately one LCF per 50,000 shipments. This

reduction is primarily due to the fact that dedicated trains do not stop in yards for classification, reducing the total exposure time.

The total radiation dose to a person standing 98.5 feet (30 m) from a train carrying a single SNF/HLRW car as it passes at 15 mph (24 km/hr) is calculated to be approximately 0.0004 mrem (this value is independent of train type). For comparison, the average dose received by a passenger on a four-hour jet flight is roughly 3 mrem, or four orders of magnitude greater than a cask shipment.

Rail worker doses are lower for dedicated trains than for key and regular trains. The total radiation dose to all rail workers through regular or key trains for the examined routes ranges from 0.0988 person-rem to 0.1755 person-rem per shipment, or 3.95×10^{-5} to 7.02×10^{-5} LCF. The highest range of this estimate corresponds to approximately one LCF per 14,000 shipments. Dedicated train single shipment doses ranged from 0.0496 person-rem to 0.0987 person-rem, which translates into 1.98×10^{-5} to 3.95×10^{-5} LCF. This small decrease in absolute dose value is primarily due to the reduced yard visits of dedicated trains.

Train crew doses are actually higher for dedicated trains than for the other service types due to the proximity of the cask car to the locomotive in a dedicated train consist; however, in all cases the radiation exposure of the train crew from a single cask shipment is multiple orders of magnitude less than the annual limits prescribed by Federal regulations (10 CFR 20). The highest exposure estimate of a dedicated train crewmember is 0.808 mrem per single cask shipment. For comparison, the regulatory maximum annual dose for non-radiation workers is 100 mrem, or over 100 single cask shipments in a year by the same crewperson for this worst-case dose estimate. The highest crewperson dose per single cask shipment for regular or key trains is less, approximately 0.016 mrem.

Accident-Related Risk

The assumptions used to analyze the accident consequences and probabilities make regular and key trains nearly identical in terms of risk.

The historical accident probabilities were sorted by the resulting radiological severity category. The consequences of category I, II, and III accidents are slight in terms of resulting LCF for all train service types. Analysis indicates that category II and III accidents are very unlikely events, regardless of service type.

The event trees constructed from historical accident data indicate that the most likely sources of category II accidents are derailment accidents and yard accidents. The probability of an accident that is more severe than the NRC HAC package certification regulatory test requirements (category III) is extremely low for all service types. Dedicated trains have the lowest accident probability due to the decreased stopping distance of the shorter consist, the fewer number of cars to derail, and fewer yard visits (decreasing yard accident probabilities). The probability of a fire engulfing the cask car

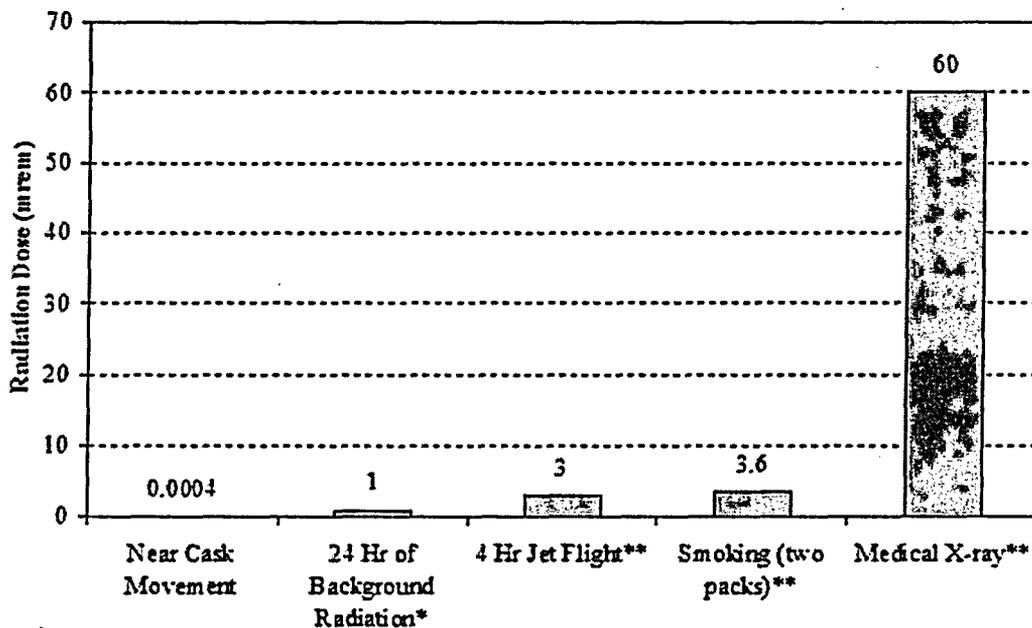
is lower for dedicated trains because cars carrying hazardous materials are restricted from the consist.

The predicted LCF consequences of category I, II, and III accidents are multiple orders of magnitude less than one per incident, regardless of service type. As with incident-free transport, differences in service are delineated in the results of this study. Regular or key trains involved in a category III accident are estimated to result in less than 0.03 LCF. The LCF prediction for dedicated trains involved in a category III accident is considerably lower: less than 0.009 LCF. The differential is due to the fact that the greater number of cars in regular and key trains requires more rerailling time. The accident consequences of category I and II accidents are substantially less severe, resulting in several orders of magnitude less than one LCF per incident.

Significance of Findings

The study concluded that the maximum individual radiological exposure resulting from an incident-free shipment of SNF or HLRW by regular, key, and dedicated trains is approximately equal to the exposure received in the first two seconds of a typical 4-hour airline journey. Figure 1 compares incident-free exposure rate with other common exposures.

Figure 1
Comparison of Incident-Free Exposure Rate vs. Other Common Exposures



Source:

* www.nrc.gov

** National Council on Radiation Protection (NCRP)

The dominant feature that differentiates the three types of service in the incident-free analysis is transit time. Although both key and dedicated trains have a 50 mph operating speed limit, dedicated trains will have the shortest transit times because they would spend less time in yards.

Dedicated trains would be expected to have lower collective population exposures because of the shorter transit times. Dedicated train crew exposures would be higher due to the cask being closer to the crew. The study did not take into account potential As Low As Reasonably Achievable (ALARA) radiation controls that could be used by train crews to further limit their potential exposure.

When considering the accident-related radiological risks there are three relevant issues: the likelihood of an accident, the severity of the accident, and the recovery time from the accident. When considering the accident risk, the likelihood of a category III accident, where cask damage exceeds regulatory limits but does not involve radioactive material release, dominates the analysis. For all types of service studied, the category III events are very rare. The resulting exposure would still result in a small fraction of one LCF.

Dedicated trains, compared to regular and key trains, reduce the potential radiation exposure in any accident, as accident clearing can be expedited with shorter trains. In addition, since there are no other hazardous materials in the consist, there would be little chance of a fire which would prolong the response and accident clearing duration.

Key trains, similar to dedicated trains, provide an increase in safety resulting from speed restrictions, but are more similar to regular trains in terms of overall risk. Key trains have a risk of high-speed impacts equal to or slightly greater than that of dedicated trains, which could result in cask damage that could potentially exceed the criteria to which it was certified. A severe fire involvement and yard accident probability of a key train is equal to the risk for regular trains. Given a derailment, the length of regular and key trains and the likely number of derailling cars will extend the time necessary to address an accident and increase the radiation dose to surrounding populations.

Analysis of the location and pattern of accident occurrences indicates that route specific factors, such as the number of yards encountered, can have a significant impact on risks. The use of dedicated trains will expedite shipments and will reduce the hazards associated with frequent yard visits, especially on long routes where multiple stops in yards are required. Use of dedicated trains also allows more flexibility to avoid higher-risk locations and to impose restrictions such as lower operating speeds.

In this study a consist of only one cask was assumed to be present in any of the transport options. Operating consists of multiple casks could be included in any of the trains changing the cumulative exposures to crewmembers and the general public. Multiple cask consists would in general reduce the cumulative radiation exposure for the incident-free case, but might slightly increase the probability of severe accidents due to a cask-to-cask collision.

Note on Total System Risk

Some analyses of the merits of dedicated trains suggest that their use would increase train miles and thus, overall, increase risk in rail transportation. FRA appreciates this perspective but believes this consideration is not dispositive for the following reasons:

- Any additional net increase in exposure is significantly less than that associated with the dedicated train. A conventional train would need to switch the shipping point, incurring risk similar to that incurred by the dedicated train. Depending upon the configuration of the rail facilities, including the industry track, additional risk might be introduced related to cars left on the main line (collision potential, roll-away potential) in the conventional train configuration. The same issues apply at destination
- As reflected in the Volpe Study, the more direct route taken by the dedicated train reduces both non-incident and accident-related risk associated with this type of shipment
- Under the new AAR Standard, the likelihood of derailment associated with transportation of the overweight cask car will be further mitigated through use of a state-of-the-art consist (Although defined in terms of key trains, this is actually a dedicated train concept and is wholly incompatible with a general manifest train)
- Use of Electronically Controlled Pneumatic (ECP) brakes by dedicated trains will reduce or greatly mitigate collision events, including highway-rail crossing collisions
- The principal element of exposure for all types of trains are highway-rail grade crossing accidents. This exposure, and it is the same for dedicated, key, and regular trains, is in decline due to improvements in engineering, education, and enforcement (when compared with the incident rate during earlier studies).¹⁴

It should also be noted that, as a society, some risks are tolerated more readily than others. Normal risks associated with rail transportation are more readily tolerated than the risk of a significant event involving a SNF/HLRW movement, in part because of limited public understanding regarding the safeguards provided. Where public tolerance is low, there is value (in the form of reduced anxiety and increased acceptance) in further reducing the already-low risk that a serious event will occur.

Summary and Conclusion

The Volpe Study indicates that risk to employees and the public from transportation of SNF/HLRW is low, but on a comparative basis dedicated trains appear to offer advantages over general consists. Several of these inherent advantages—avoiding yards, reducing derailment potential, and reducing the risk of involvement of other hazardous materials in an accident scenario—could be further exploited with careful attention to

¹⁴ Exposure related to trespassers on railroad property is a material issue, but it is by no means clear that the number of casualties varies by number of trains operated or by train miles.

conditions of transportation.

For instance, the recent AAR Standard S-2043,¹⁵ which was issued too late for formal consideration in the Volpe Study, calls for use of ECP brakes on trains carrying SNF/HLRW. ECP brakes have the capability of reducing stopping distances by 40-60 percent. Coupled with uniform composition of the consist, ECP brakes should significantly enhance the ability of the locomotive engineer to control in-train forces and mitigate the severity of collision with other trains and obstructions on the right of way, including vehicles at highway-rail crossings. In some cases, collisions may be avoided entirely. Use of the communications backbone provided by ECP brakes may also make possible the use of on-board sensors that can identify safety problems such as overheated bearings before they progress to failure. These kinds of engineering enhancements should be possible with equipment dedicated to these special trains. By contrast, such enhancements will not be implemented for some time on the general interchange fleet.

FRA's SCOP efforts are also much more likely to be successful if dedicated equipment and special trains are employed. While inspection processes are a proven, essential element of quality control, they work best as part of a total system approach. Being able to examine dedicated equipment at regularly-established shop locations and following the service history of the equipment to identify any propensities for wear or malfunction will increase the reliability of the inspection process both for the railroad and FRA.

Historically, the principal objection to use of dedicated trains was cost to the shipper. However, FRA's preliminary analysis indicates that use of dedicated trains should not result in significantly higher costs for these movements. Bypassing switching yards dramatically shortens transit times and lowers the cost of dedicated train operations. Dedicated trains comprised of state-of-the-art equipment maintained for this service and operated in small consists should incur many fewer mechanical malfunctions (e.g., broken coupler knuckles, unintended emergency brake applications) that could delay transportation and result in unexpected costs to shippers and the railroad.

A cost comparison of the six routes used in the study indicates that the operational and escort labor costs of dedicated train shipments of at least three casks or more are approximately equal to or less than if shipped by a train which would require yard switching. Thus the inherent cost of a dedicated locomotive and crew can be offset by the shorter transit time. Public costs should also be lower, since SCOP inspections can focus on a smaller number of route miles and fewer units of rolling stock.

Over the next 18 months, FRA will further explore in detail the costs associated with the use of dedicated trains and other special conditions of transportation that may further reduce the already low risks associated with transportation of SNF/HLRW, and determine whether further regulations governing transportation of these materials are required.

¹⁵ Association of American Railroads (AAR). "Performance Standard for Trains Used to Haul High Level Radioactive Material." Washington, D.C.: AAR Circular Letter C-9619 /AAR Standard S-2043, April 2003.



Spatial Analysis and Decision Assistance (SADA) Version 4.1

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January 11, 2006



Research Objective Dealing with Subsurface Radionuclides

Pursue more realistic and defensible estimates of exposure of the public to radiation from radionuclides released from contaminated sites through optimization of sampling and analysis

2

Successful Adaptive Sampling Applications and Projected New Uses

FEDERAL SITE IMPLEMENTATIONS

Sandia National Laboratories

- Estimation of contaminated soil volumes;
- Number of bores reduced by 40%, samples by 80%.

Kirtland Air Force Base

- Estimation of contaminated soil volumes;
- Number of bores reduced by 30%, samples by 50%.

Arcones National Laboratory

- Estimation of extent;
- Number of samples reduced by 60%.

Brookhaven National Laboratory

- Estimation of contaminated soil volumes;
- Cost estimates for removal action reduced from \$40M to \$8M.

Extruded Site

- Radionuclide soil contamination;
- Support excavation design and execution;
- Expected to reduce \$8M sampling to less than \$40M.

Joliet Army Ammunition Plant

- Estimation of contaminated soil volumes;
- Per sample costs reduced by 80%.

RESRAD Fairport Site

- Mixed waste soil contamination;
- Overall project savings estimated at \$10M.

RESRAD Ashland

- Radionuclide soil contamination;
- Precise excavation support;
- Overall project savings estimated at \$10M.

NRC

NRC Specific Testing and Application

- Kirkil - Could have reduced number of bores 70%, sampling by 85%
- Molycoop
- Sequoyah Feels - TBD

NRC Projected Applications

- Reactor early site permit (ESP)
- Combined construction operating license (COL)
- Re-licensing
- Partial site release

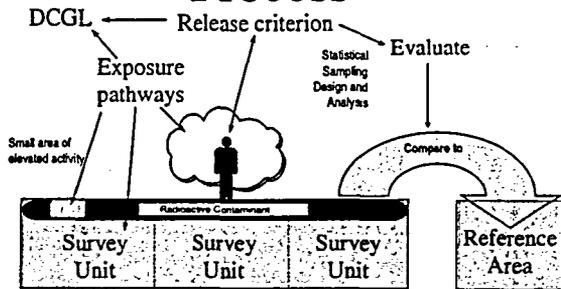
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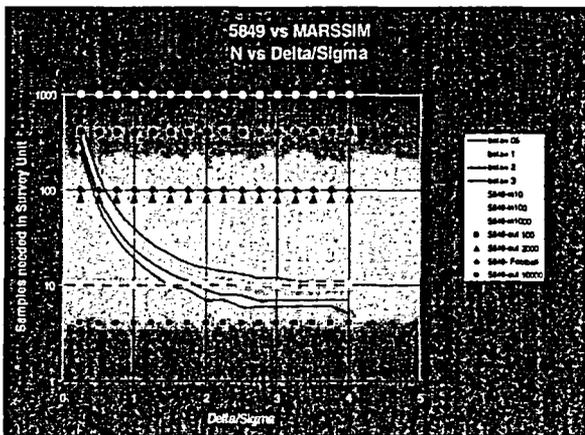
Planning (Multi Agency)

- Understand requirements of pending decisions
- Explicitly identify and manage uncertainties that could lead to decision errors
 - Sampling uncertainties - MARSSIM (Aug 2000)
 - Analytical uncertainties - MARLAP (Dec 2003)
 - Materials specific – MARSAME (Target 2007)
 - Subsurface specific – MARSSub (TBD)
- Implementing the intent of "performance based" (surface/subsurface sampling & analysis) – SADA

MARSSIM DQO/DQA Process



5



Sampling the Subsurface

- How is designing a sampling survey for subsurface materials different from designing a sampling survey for surface materials within the first 15 cm of soil?
- At issue is how to design the survey more efficiently, because the sampling effort is considerably higher for subsurface sampling than it is for surface soil sampling.
- The approach needs to be better than what we are doing now, with a justifiable technical basis and no hidden assumptions.

Active Research Areas

- Doing more with less
- Optimizing sampling costs and analytical costs
- Better survey design using site knowledge as a guide (Bayesian)
- Better data analysis using sophisticated statistics (geostatistics)
- Dispersed plume versus discrete sources
 - "Elevated volume" analogue to "elevated area"
- Cannot scan 100% in Class 1 – How do we keep confidence High and uncertainty Low?
- Incorporating surrogate data and professional judgment data into the decision process (e.g., geophysical, hydrological data)

HOW DO YOU MAKE IT USABLE?????

Design More Efficient Surveys

Reduce required number of samples by increasing the information available by other means than simply taking more direct measurements. This can be done in two ways:

- 1) increase the information available from professional knowledge of site processes, historical data, pollutant transport etc.
- 2) make more efficient use of the hard data that is already available by the use of more advanced statistical methods.

Develop further design efficiency

- Incorporate prior information quantitatively as "soft data" that can be combined with hard concentration data from samples- Bayesian Statistics
- Sampling design based on maximizing the information that will be added - not all locations are equally informative
- Geostatistical data analysis that incorporates known spatial relationships among data locations
- Geophysical data may be used for scanning - Bayesian extensions to ELIPGRID

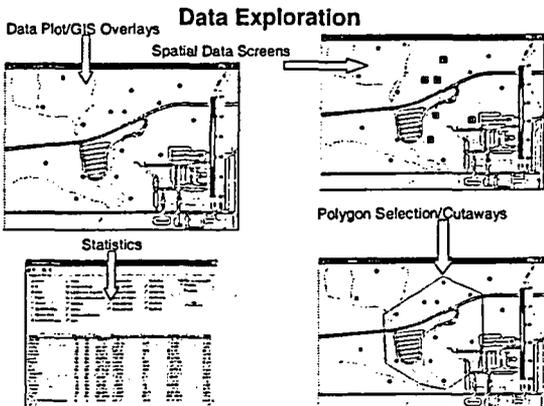
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SADA Overview

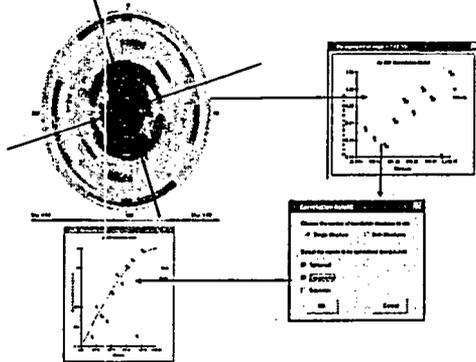
Windows--based freeware designed to integrate scientific models with decision and cost analysis frameworks in a seamless, easy to use environment.

- Visualization/GIS
- Statistical Analysis
- MARSSIM Module
- Geospatial Uncertainty Analysis
- Sampling Designs
- Custom Analysis
- Geospatial Interpolation
- Area of Concern Frameworks
- Human Health Risk Assessment
- Ecological Risk Assessment
- Cost Benefit Analysis
- Export to Arcview/Earthvision

SADA has been supported by both the DOE, EPA, and the NRC. SADA Version 3.0 had about 11000 downloads. Version 4.0/4.1 has had about 4000 since January, 2005.



Correlation Modeling Tools



Sample Designs

SADA has a number of sample design strategies in Version 4.0. These strategies include initial and secondary designs. Some are based on data alone while others are based on modeling results. With the exception of a couple of exclusively 2d designs all are available in 3d dimensions.

- | | |
|---|--|
| <p>Initial Sample Designs</p> <ul style="list-style-type: none"> • Judgmental • Simple Random • Simple Grid • Simple Unaligned Grid • Standard Grid • Standard Unaligned Grid • MARSSIM Design • 2d and 3d Hot Spot search designs | <p>Secondary Sample Designs</p> <ul style="list-style-type: none"> • Threshold Radial • Adaptive Fill • High Value <ul style="list-style-type: none"> - (soft, simulated & unsimulated) • High Variance <ul style="list-style-type: none"> - (soft, simulated & unsimulated) • Extreme Value <ul style="list-style-type: none"> - (soft, simulated & unsimulated) • Area of Concern Boundary Design <ul style="list-style-type: none"> - (soft, simulated & unsimulated) • Minimize/Maximize Area of Concern • LISA Designs <ul style="list-style-type: none"> - (Ripley's K, Moran's I, Geary's C) |
|---|--|

Judgmental Sampling

Description

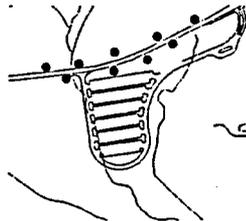
- Selection of sample locations based on expert knowledge or professional judgment

Pros

- Easy to implement
- more efficient (when correct)

Cons

- Introduces bias
- Cannot reliably estimate precision of estimates nor use statistical analyses to draw conclusions



Custom Criteria

- View or Edit Criteria
- Data Screens

SADA
Small Area and Data Assessment

Human Health Risk Calculations

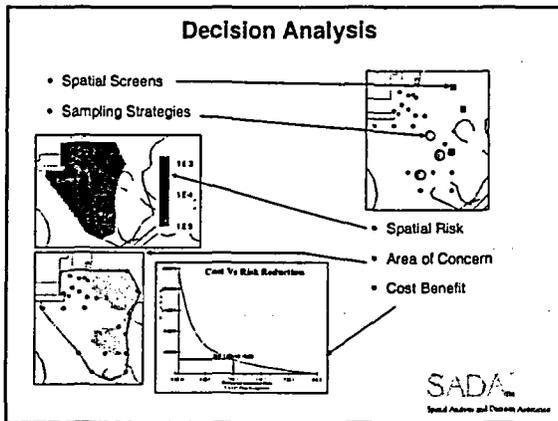
- For each media
 - Soil, Sediment, Surface Water, Groundwater
- Exposure Scenarios
 - Residential, Industrial, Recreational, Agriculture, Excavation
- Exposure Pathways
 - Ingestion, Inhalation, Dermal Contact, Food Chain (Beef, Milk, and Vegetable Ingestion)
- IRIS and HEAST Toxicity Databases for Carcinogenic and Noncarcinogenic Effects
- Physical Parameters for Modeling
 - Bioaccumulation Factors
 - Volatilization, Particulate Emission Factors
 - Permeability Constants, Absorption Factors
 - Saturation Coefficients, Radionuclide Half-Lives

SADA
Small Area and Data Assessment

Human Health Spatial Risk Maps

- SADA calculates risk for each sampling point or spatial estimate based on contaminant and exposure scenario
- Legend scale changes to risk

SADA
Small Area and Data Assessment



Overview of Geobayesian Modeling

- Integrates bayesian update methods with standard geostatistical approaches
- Makes use of prior knowledge ("soft information")
- Integrates soft information with hard sample data to produce a combined or collective characterization result.

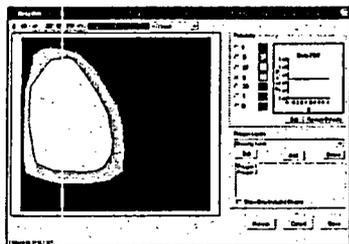
Geobayesian modeling joins SADA's suite of other spatial modeling tools

- Natural Neighbor
- Nearest Neighbor
- 3d Inverse Distance
- Ordinary Kriging
- Indicator Kriging
- Geobayesian Modeling**

Furthermore, the Geobayesian model is connected other existing models such as remedial design, sample design, and cost analysis.

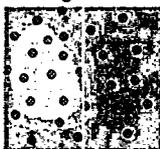
Denoting high probability, low probability, and unknown contaminated areas.

User creates a "site conceptual model" denoting areas of high, low, and unknown probabilities of contamination.



Example Sample Designs

Judgmental



Simple Grid



Random



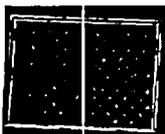
Simple Unaligned Grid

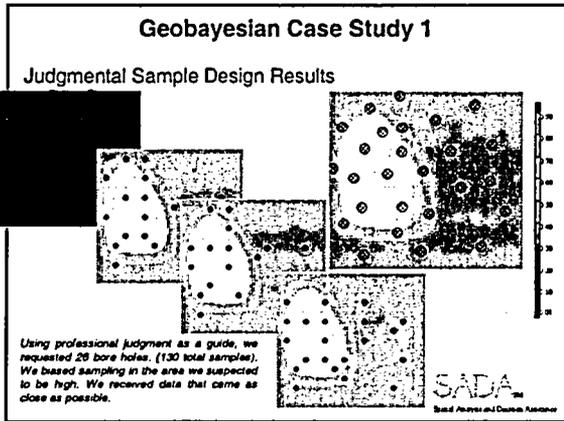


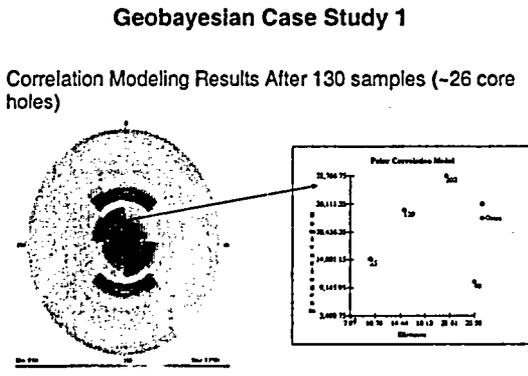
Case Study: Site Description

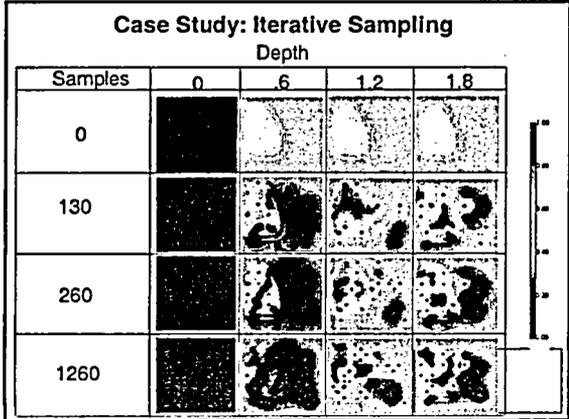
The KISKI Data Set

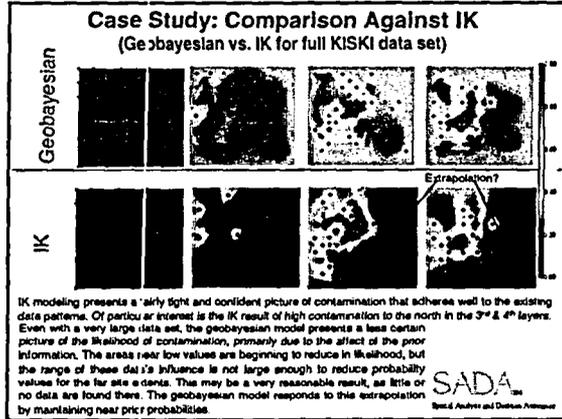
- Received by NRI as an example data set to test Geobayesian modeling.
- 1261 samples in shallow sediment.
- ~90 boreholes.
- Values range from near zero to 900 pCV/g.
- Large number of data, but typical spatial distribution.
- Good starting point for evaluating the new Geobayesian approach.

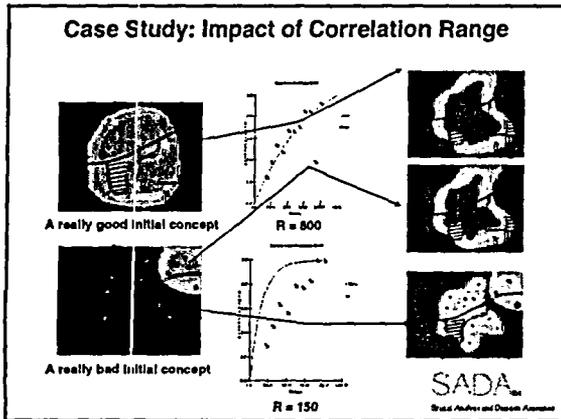












Markov Bayes II

- Explicitly incorporates soft information such as core hole scans, ground penetrating radar, etc into the model
- Can produce more realistic heterogeneous results
- Can support investigations that have sparse data sets
- Source code is available for implementation in SADA

