

FD 35106

STB talking points –

The DOE's application for a Certificate of Public Convenience and Necessity (CPCN) should not have been filed and should not be approved by the STB

It does not have enough information for experts or the public to do a thorough evaluation of construction or operation of the proposed rail line.

There has not been an environmental impact analysis done making the application incomplete and the lack of an adequate design leaves the public unable to provide informed comment

DOE needs thoroughly describe where the expertise will come from to build and operate the rail line since they will not do so themselves. Those performing the work should be accountable for the performance and to the millions of people affected by the project.

There are national implications and impacts from rail transport of waste to Yucca Mountain, NV. Decisions made about the Nevada portion of the transport will ripple across the country and affect all communities from the destination, back to areas where the waste starts its journey

The shipping campaign will last for many decades and affect millions of citizens and communities so decisions made now will be important for decades to come

Shipments will pose potentially high risks to the public and workers. The average load of irradiated fuel waste, if shielding is lost, gives a lethal dose to a nearby person in one to two minutes.

Each cask would have the radioactive equivalent of 100 Hiroshima bombs.

Severe accidents would cost billions to cleanup and could affect the health of future generations of those involved. How can this be deemed appropriate for a "certificate of public convenience and necessity?"

High-level nuclear waste and irradiated fuel shipments provide a tempting terrorist target.

DOE is not only not involving many of the agencies and entities that would be involved if an act of terrorism or sabotage happens but even opposes the mandatory use of dedicated trains

Rules, regulations and procedures are still being developed for rail safety and protection of hazardous materials.

DOE selected the Caliente corridor for the rail line without a valid comparison with other possible routes. The Environmental Impact Statement that was prepared for selecting the preferred corridor compared Caliente with the Mina route which cannot be selected so there was no choice at all. A new EIS should be performed showing the impacts, advantages and disadvantages of all other possible choices that could in fact be selected.

The EIS did not contain specific information needed to make a complete analysis or provide the public with enough information so that people "on the ground" could contribute their knowledge of the land involved.

Impacts to Clark County, Las Vegas, where the majority of shipments could go and affect millions Nevada citizens and visitors were not adequately considered in the EIS.

The analysis should have also included the many people in AZ, CA and those in cars on the freeways that parallel the rail line and could be affected by an accident or incident involving a rail shipment of waste headed for Yucca Mt.

The STB public hearing on December 4 discourages public involvement.

Holding the meeting in an NRC hearing facility is inappropriate. There is very limited parking and access is difficult because of over-zealous security requirements that are required by NRC for its licensing proceedings.

Many people wishing to speak were not allowed to do so because sign-up had to be done before a deadline, electronically in PDF format. There is no provision for people who are able to attend and wish to speak to arrange to do so.

Priority is given to elected officials, not the public. Certainly STB should hear from both and if that involves more than one day of hearings, so be it. Elected officials are important but the families who will live with the consequences of the STB's decisions need to be heard if they wish to make a statement.

STB makes videos of hearings available on their website and the larger community is informed about important hearings and meetings through local media, especially TV news. The NRC building does not allow cameras and has no Internet access.

STB, NRC, DOE, EPA and any other governmental agencies making decisions regarding the Yucca Mountain project should not be working cooperatively to create disincentives for public involvement. This hearing could have been held in any number of public meeting facilities in Las Vegas and additional hearings should be held in cities and towns affected by the rail line in question.

*Handwritten signature: Stanley J. ...*