



February 17, 2009

Francis G. Schwartz
GNEP PEIS Document Manager
Office of Nuclear Energy
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Dear Mr. Schwartz:

On behalf of the members of The Council of State Governments' Midwestern Radioactive Materials Transportation Committee, we are writing to submit the Midwestern states' comments on DOE's Global Nuclear Energy Partnership (GNEP) draft Programmatic Environmental Impact Statement (PEIS). The members of the committee are appointed by the Midwestern state governors and legislative leaders to represent the region in addressing transportation issues with DOE programs that ship radioactive waste and material. The states represented on the committee are Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, North Dakota, Ohio, South Dakota, and Wisconsin. Two of our states – Illinois and Ohio – host sites that at one time were under consideration for GNEP facilities.

On the specific subject of transportation, we note that "transportation and associated health impacts from the closed fuel cycle alternatives [DOE is considering] would be generally higher during the operational period than those from the open cycle alternatives." As representatives of the states likely to be affected by those higher impacts, we feel it is very important for DOE to reduce, to the maximum extent possible, the health-related impacts of transportation by reducing the number of shipments and the travel distances for shipments.

Regarding the former, we are not advocating that DOE select the option that will entail the least number of shipments because we recognize that there may be other advantages and impacts that balance the transportation impacts. When it comes to selecting the shipping mode, however, we do feel DOE should give serious consideration to shipping by rail to the maximum extent possible. The analysis shows that a combination of rail and truck transport has the potential to greatly reduce the number of shipments compared to shipping by truck alone. The most extreme case is the High-Temperature Gas-Cooled Reactor option, which would drop from 979 incident-free latent cancer fatalities (LCFs) for truck-only transport to five LCFs if DOE were to employ both truck and train for transport. The other options show significant if less dramatic reductions in incident-free LCFs, therefore maximizing rail as a transport mode is one way to reduce the impact of transportation on human health.

701 East 22nd Street
Suite 110
Lombard, Illinois 60148
Tel: 630/925-1922
Fax: 630/925-1930
E-mail: csgm@csg.org
www.csgmidwest.org

Michael H. McCabe
Regional Director

Lexington
P.O. Box 11910
Lexington, Kentucky 40578
Tel: 859/244-8000

Atlanta
P.O. Box 98129
Atlanta, Georgia 30359
Tel: 404/633-1866

New York
40 Broad Street
Suite 2050
New York, New York 10004
Tel: 212/482-2320

Sacramento
1107 9th Street
Suite 730
Sacramento, California 95814
Tel: 916/553-4423

Washington
444 North Capitol Street, NW
Suite 401
Washington, DC 20001
Tel: 202/624-5460

Francis G. Schwartz

February 17, 2009

Page 2

Second, because impacts are “dependent on the distance that material would be transported” (p. S-51), when DOE does reach the point of deciding where to locate GNEP facilities, the department should first evaluate all potential locations on the basis of their effect on travel distances.

While the draft PEIS does consider the health impacts on shipment escorts, it does not appear to assess the impacts on state personnel that will perform in-transit inspections of trucks and trains (p. E-55). The states have the authority to inspect shipments that cross their borders, and three of the states in the Midwest require inspections for shipments of spent fuel and other HRCQ material. To adequately assess the potential health effects, DOE should include the impacts of these in-transit inspections on personnel.

Regardless of what option(s) DOE chooses to implement, transportation impacts will be significant in terms of the number of shipments passing through the affected states. The Midwestern states urge DOE to implement the same kind of cooperative and consultative transportation planning process that has worked so well on high-profile shipping campaigns such as shipments of transuranic waste to the Waste Isolation Pilot Plant (WIPP) and shipments of spent fuel from foreign research reactors to Idaho and South Carolina. It will also be important for DOE to fund the same type of comprehensive transportation safety programs required for the WIPP program in Section 16 of the WIPP Land Withdrawal Act. These safety programs have gone a long way toward not only preparing state and local governments to respond to accidents involving shipments but also to increasing the public’s level of comfort with shipments through their communities.

We appreciate the opportunity to comment on the draft PEIS. If you have any questions, please contact Ms. Lisa Janairo of the CSG Midwest staff at 920/458-5910 or ljanauro@csg.org.

Sincerely,



Kevin C. Leuer
Minnesota Division Homeland Security
and Emergency Management, and
Co-Chair, CSG Midwestern Radioactive
Materials Transportation Committee



Melanie Rasmuson
Bureau of Radiological Health,
Iowa Department of Public Health, and
Co-Chair, CSG Midwestern Radioactive
Materials Transportation Committee