DEPARTMENT OF THE NAVY

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FOR THE CONTAINER SYSTEM FOR THE MANAGEMENT OF

NAVAL SPENT NUCLEAR FUEL

AT FORT HALL, IDAHO

JUNE 3, 1996

AFTERNOON SESSION

MODERATOR: Lieutenant Timothy Sullivan, USN

SPEAKERS: Mr. Elmer Naples
Mr. William Knoll

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Our next speaker is Lucille Edmo.

MS. EDMO: My name is Lucille Edmo and it is spelled L-U-C-I-L-L-E, E-D-M-O. I am a member of the Shoshone-Bannock tribe and I have a BA degree. My box number is Box 367, Fort Hall, Idaho, 83203.

And first of all, I just want to begin by saying that I am totally against any nuclear waste shipments at INEL or to the Idaho National Engineering Laboratory. And I do know that nuclear waste has seeped into the Columbia River system near the Hanford Nuclear Facility in Washington and it is a fact that large doses and exposure to radiation by human beings will cause cancer. And too many times the poor and the uneducated receive the bad deals. A

The federal government bureaucrats and the Congressional representatives made the choice for the poor that these shipments would be placed at the INEL and knowing full well that the uneducated will not buck the system and some poor people, including poor whites who are also illiterate, will never speak out against such an atrocity.

The federal government in the early B

1700s had an extermination and annihilation policy towards Indian people or Native Americans. Many Native Americans lost their lives because of viruses such as small pox were deliberately used to annihilate Native Americans. Government surplus blankets infected with small pox disease was distributed to Indian people.

The correlation or implication I may allude to is that there is the possibility of Native Americans being contaminated by nuclear waste, either while transportation of the waste or contamination of the aquifer by seepage of waste into the water. This could be termed another extermination policy and this is my own perspective.

No matter what paid federal government officials tell me, I will refuse to accept it at face value about the good aspects of nuclear waste shipments. And I am against the nuclear waste stored at the INEL site and the current transportation of the waste to the facility. C

I watched on television the effects of the Chernobyl accident and the devastating effects of the radiation exposure to the land and

the people there, and I have read of the Three Mile Island accident.

I have read in the newspaper, the Post Register of Idaho Falls, about storage containers at the INEL site that have eroded. If I remember correctly, these storage containers apply to waste that has been stored at the site for years. Nevertheless, the possibility can occur again because of mismanagement and carelessness. D

And one last thing, when I referred to the Hanford site in Washington, there have been other tribes, including Yakima and Umatilla, who have spoken at Native American conferences about the nuclear waste and the contamination of the fish in the Columbia River system and the human effects of the waste haven't been determined.

Even at Chernobyl the effects of the nuclear accident upon the human population haven't been determined. Thank you.

LIEUTENANT SULLIVAN: Thank you, Ms. Edmo.

Mr. George Wood.

MR. WOOD: My name is George Wood and I want to make a couple of remarks because I was a former naval aviator serving aboard aircraft

Commenter: Lucille Edmo - Shoshone-Bannock Tribe Member, Idaho

Response to Comment:

A. & C. As discussed in the Container System EIS, naval spent nuclear fuel already exists and will require safe management. The Programmatic SNF and INEL EIS addresses shipment of naval spent nuclear fuel to Idaho National Engineering Laboratory. The Container System EIS addresses loading naval spent nuclear fuel into dry storage containers and transportation out of the state of Idaho. In both of these documents, analysis results are presented which show that naval spent nuclear fuel can be managed safely. All members of the public are able to comment on these documents regardless of their level of education or wealth. The National Environmental Policy Act established a national policy of promoting awareness of the environmental impacts of activities by federal government agencies.

B. The analysis results provided in this EIS show that naval spent nuclear fuel can be safely managed, stored, and transported with no significant impact on members of the public. The analysis methods used in this EIS are recognized throughout the United States and the world as the standard techniques for determining the risk to the public. In Chapter 3, a perspective is provided so the public can compare the analysis results to risks associated with other activities encountered in daily life. In addition, Chapter 7, Section 7.3.5 provides very specific information for Fort Hall Reservation residents which shows that over a 40 year period the entire aggregate radiation exposure to all residents of the reservation due to transportation of naval spent nuclear fuel is equal to that received during a single chest x-ray to a single individual.

The storage and shipping process for naval spent nuclear fuel has been designed to isolate radioactive waste from the environment. Further, there is no evidence that naval fuel has contaminated the aquifer.

C. See response for Comment A above.

D. In Chapter 3, Section 3.8, Comparison of Alternatives, the EIS states that the impacts for most categories are small or nonexistent for all alternatives. Since 1957, the Navy has safely shipped over 660 containers of spent nuclear fuel from the shipyards and prototype sites to the Naval Reactors Facility. All of the shipments were made safely by rail and without release of radioactivity. Since any container alternative selected for dry storage and transportation (either by rail, heavy-haul truck, or a combination of both) must meet the requirements of 10 CFR Part 71, Packaging and Transportation of Radioactive Material, and 10 CFR Part 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Waste, other containers can also be used safely and reliably. As part of these licensing requirements, procedures must be in place to monitor the containers during storage and transportation to ensure that they do not deteriorate.

Railcars for Navy shipments are Government-owned boxcars, flatcars, depressed-center flatcars, and wellcars used exclusively by the Navy. These railcars are equipped with features like roller bearings, locking couplers, and end-of-car cushioning units which reduce the probability of accidents resulting from equipment failure and mitigate the potential for damage in the unlikely event of a collision or derailment. Navy railcars are thoroughly inspected prior to each use and confirmed to meet all requirements. Such inspections and on-going maintenance ensure that equipment remains in first-rate condition.

Written procedures are used by the Navy for the inspection and maintenance of shipping containers. Inspections and maintenance are performed at the shipyard before loading the shipping container with fuel modules and the loaded shipping container is thoroughly inspected before leaving the shipyard. Upon arrival at Idaho National Engineering Laboratory containers are again inspected thoroughly. Inspections and maintenance are performed on

shipping containers after the fuel modules are unloaded at Idaho National Engineering Laboratory. These procedures meet the requirements listed in 10 CFR Part 71 Subpart G - Operating Controls and Procedures.

Naval spent fuel is packaged in shipping containers that meet the Type B rating as specified in the regulations of the U.S. Nuclear Regulatory Commision and the U.S. Department of Transportation. Tiedowns are specifically designed for each container/railcar combination to provide for retention of the container in place even during abnormal transport conditions. Boxcars are locked, externally and internally, and sealed.

Each shipment is accompanied by a Government-owned escort caboose occupied by Navy couriers who maintain constant surveillance of the shipment. The shipment contents are rugged and stable, the containers are robust, the railcars are well maintained, and trained Government escorts accompany each shipment. As a result, the probability of a serious accident is extremely remote.