



7

Environmental Impacts of the No-Action Alternative

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7. ENVIRONMENTAL IMPACTS OF THE NO-ACTION ALTERNATIVE

This chapter describes the potential impacts associated with the No-Action Alternative described in Chapter 2. Under the No-Action Alternative and consistent with the Nuclear Waste Policy Act, as amended [NWPAA, Section 113(c)(3)], the U.S. Department of Energy (DOE) would terminate activities at Yucca Mountain and undertake site reclamation to mitigate any significant adverse environmental impacts. Commercial utilities and DOE would continue to manage spent nuclear fuel and high-level radioactive waste at 77 sites in the United States.

DOE analyzed the No-Action Alternative to serve as a basis for comparing the magnitude of potential environmental impacts in the Proposed Action. Under the No-Action Alternative, and consistent with the NWPAA, DOE would terminate activities at Yucca Mountain and undertake site reclamation to mitigate any significant adverse environmental impacts. In addition, DOE would prepare a report to Congress, with its recommendations for further action to ensure the safe, permanent disposal of spent nuclear fuel and high-level radioactive waste, including the need for new legislative authority. Under any future course that would include continued storage at the generator sites, commercial utilities and DOE would have to continue managing spent nuclear fuel and high-level radioactive waste in a manner that protected public health and safety and the environment. However, the future course that Congress, DOE, and the commercial utilities would take if Yucca Mountain were not approved is uncertain.

DOE recognizes that a number of possibilities could be pursued, including continued storage of spent nuclear fuel and high-level radioactive waste at its present location, or at one or more centralized location(s); the study and selection of another location for a deep geologic repository (Chapter 1 identifies the process and alternative sites previously selected by DOE for technical study as potential geologic repository locations); the development of new technologies (for example, transmutation); or reconsideration of alternatives to geologic disposal (as discussed in Chapter 2, Section 2.3.1). The environmental considerations of these possibilities have been analyzed in other contexts in other documents to varying degrees. DOE also recognizes that under the No-Action Alternative, there would be an increased probability of shutdown of operating reactors before operating license expiration due to the lack of adequate spent nuclear fuel storage capacity, with an attendant loss of electric power generation for that area or region. While the Department recognizes that many environmental impacts could result from shutting down nuclear power reactors, a full evaluation of such impacts (such as generation of additional air pollution from replacement sources of electricity) would be highly speculative because the choice of a replacement power source (importation, solar, gas, coal, etc.) would be regionally dependent, and the affected utilities would make the ultimate decision. Because the determination of local and regional impacts resulting from the loss of electric generating capacity for shutdown reactors, including the potential for increased electricity prices, would be speculative, the EIS does not include a detailed discussion.

Table 7-1 lists representative studies related specifically to centralized or regionalized interim storage, including alternatives evaluated in DOE National Environmental Policy Act documents, and summarizes the relevant environmental considerations. Those studies contain more information on the potential environmental impacts of centralized or regional interim storage.

In light of these uncertainties, DOE decided to illustrate the possibilities by focusing the analysis of the No-Action Alternative on the potential impacts of two scenarios—long-term storage of spent nuclear fuel and high-level radioactive waste at the current sites with effective institutional control for at least 10,000 years (Scenario 1), and long-term storage with no effective institutional control after about 100 years (Scenario 2). Although the Department agrees that neither of these scenarios is likely, it selected them for analysis because they provide a basis for comparison to the impacts of the Proposed Action and because they reflect a range of the impacts that could occur.

Table 7-1. Documents that address centralized or regionalized storage of spent nuclear fuel and high-level radioactive waste^a (page 1 of 5).

Title and scope of storage analysis	Environmental and other considerations
<p><i>Final Environmental Impact Statement, Management of Commercially Generated Radioactive Waste</i> (DIRS 104832-DOE 1980, all)</p> <p>Evaluates a proposal to provide interim storage of spent nuclear fuel from U.S. power reactors before final disposal. The proposal would include acceptance of a limited amount of foreign spent fuel if such actions would contribute to U.S. nonproliferation goals. Evaluates several generic interim storage facility alternatives, including centralized storage at a few large ISFS facilities.</p>	<p>Analyses include a description of a <i>generic interim storage site environment</i> based primarily on data for the midwestern United States, and potential environmental effects of such a facility for ISFS facilities. Impacts evaluated include: natural resources, radiological impacts, land use, water use, ecological resources, air quality, traffic, noise, socioeconomics, waste management, utilities, aesthetics, transportation (including both to ISFS facilities and from ISFS facilities to the disposition facility), and safeguards and security.</p>
<p><i>Recommendations on the Proposed Monitored Retrievable Storage Facility</i> (DIRS 103173-Clinch River 1985, all)</p> <p>Evaluates DOE proposal to consider the Clinch River Breeder Reactor and ORR sites in Tennessee for an MRS facility. Performed by the Clinch River MRS Task Force, which included three study groups: environmental, socioeconomic, and transportation. Public meetings and site visits were conducted by the study groups. Separate reports by each study group are summarized in findings, concerns, anticipated impacts, and recommended mitigations.</p>	<p>The Environmental Study Group’s final report presented concerns and recommended mitigations for MRS construction impacts, damage to ecosystem from construction, special nuclear risks of construction, highway construction impacts, radiation protection of workers and the public, airborne effluents, aqueous releases, hazards from cask rupture, earthquakes, flooding, long-term radionuclide containment, secondary waste stream, local control, offsite emergency response, past contamination of the ORR, environmental data from the ORR, and MRS becoming a permanent waste storage site.</p> <p>The Socioeconomic Study Group’s final report identified concerns or potentially negative impacts of an MRS and possible mitigations for business recruitment and expansion, residential recruitment and retention, institutional trust, pre- and postoperational impacts and costs, tourism and aesthetics, site neighbors, and legislative issues.</p> <p>The Transportation Study Group’s final report defined areas of potential major impacts (for example, independent inspections, upgrades of railroad tracks, routing and upgrades to preferred highway truck routes, escorts, emergency response plans and training, and requirements applicable to private carriers), and presented findings and recommendations on accident probabilities, barge transport, cask safety and contents, prenotification, and safeguards.</p>

Table 7-1. Documents that address centralized or regionalized storage of spent nuclear fuel and high-level radioactive waste^a (page 2 of 5).

Title and scope of storage analysis	Environmental and other considerations
<p><i>Monitored Retrievable Storage Submission to Congress, Volume 2: Environmental Assessment for a Monitored Retrievable Storage Facility</i> (DIRS 104731-DOE 1986, Volume 2, all)</p> <p>Evaluates a proposal for the construction of a facility for monitored retrievable storage. Evaluates two facility design concepts at each of three candidate sites in Tennessee (Clinch River Breeder Reactor, ORR, and TVA Hartsville Nuclear Power Plant).</p>	<p>Evaluates impacts common to all three sites and unique to each site, including radiological, air quality, water quality and use, ecological resources, land use, socioeconomics, resource requirements, aesthetics, and transportation. Also evaluates relative advantages and disadvantages of the six site design combinations.</p>
<p><i>MRS System Study Summary Report</i> (DIRS 104838-DOE 1989, all)</p> <p>Evaluates the role of the MRS facility in the waste management system.</p>	<p>Provides additional support to the general conclusion that an MRS facility provides tangible benefits to a waste management system, as articulated in the DOE 1986 MRS proposal to Congress (DIRS 104731-DOE 1986, Volume 2, all). Examines various system configurations in a series of separate publications:</p> <ul style="list-style-type: none"> • Scenario development and system logistics • Facility design/schedule/cost implications • Alternative MRS storage concepts • Location of high-level radioactive waste packaging • Waste package designs • Transportation impact analyses • Role of waste storage in operations of the waste management system • Licensing impacts of an MRS facility • System reliability
<p><i>Nuclear Waste Management Systems Issues Related to Transportation Cask Design: At-Reactors Spent Fuel Storage, Monitored Retrievable Storage and Modal Mix</i> (DIRS 104889-Hoskins 1990, all)</p> <p>Provides the State of Nevada evaluation of the DOE MRS proposal and the Tennessee studies and position in response.</p>	<p>Addresses the DOE MRS proposal, which evaluated the option of implementing an integral MRS facility as part of a waste management system and the option of “no-MRS facility” as part of the waste management system. The criteria for the evaluation included health and safety, economic, environmental, political (for example, acceptability, public confidence, local and state attitudes), social (for example, fears and anxieties), fairness (for example, equity, intergenerational, utilities/ratepayer, liability, geographic, interutility, and government-utility), repository scheduling, and flexibility (technical and institutional factors).</p>

Table 7-1. Documents that address centralized or regionalized storage of spent nuclear fuel and high-level radioactive waste^a (page 3 of 5).

Title and scope of storage analysis	Environmental and other considerations
<p><i>Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement</i> (DIRS 101802-DOE 1995, all)</p> <p>Analyzes transportation and centralized interim storage of existing and projected inventories of DOE spent nuclear fuel (including naval spent nuclear fuel) at one site. Considers five interim storage sites (Hanford, INEEL, ORR, SRS, and the Nevada Test Site).</p>	<p>Focuses on key discriminator disciplines at each of the five sites, including socioeconomics, utilities (electricity), materials and waste management, occupational and public health and safety (radiation effects and accidents), transportation, and uncertainties and conservatism. Discusses cumulative impacts and impacts of no action. Does not provide detailed discussions of land use, cultural resources, aesthetic/scenic resources, geologic resources, air quality, water resources, ecological resources, noise, and utilities and energy because there would be small impacts for these areas that would be indistinguishable among the alternatives.</p>
<p><i>Final Environmental Impact Statement on a Proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel</i> (DIRS 101812-DOE 1996, all)</p> <p>Evaluates a proposal to manage FRR spent nuclear fuel. Evaluates a management alternative for acceptance and management of FRR spent fuel in the United States that includes regionalized storage at SRS, INEEL, Hanford, ORR, and the Nevada Test Site. Basic implementation components of the proposal include policy duration, financing arrangements, amount of FRR spent fuel, location for taking title to FRR spent fuel, marine transport, ports of entry, ground transport, FRR spent fuel management sites, and storage technologies.</p>	<p>Analyzes impacts from policy considerations, marine transport, port activities, ground transport, and fuel management sites. More specifically, for fuel management sites, analyzes impacts for occupational and public health and safety, waste management, cumulative impacts, mitigation measures, and environmental justice. Covers impacts for land use, socioeconomics, cultural resources, aesthetics, scenic resources, geology, water resources, air quality, ecology, noise, utilities and energy, and waste management in general.</p>
<p><i>Final Waste Management Programmatic Environmental Impact Statement For Managing Treatment, Storage, and Disposal of Radioactive and Hazardous Waste</i> (DIRS 101816-DOE 1997, all)</p> <p>Evaluates programmatic alternatives for managing various DOE wastes including HLW. Regionalized and centralized storage are among the management options evaluated. Under the regionalized alternatives, canisters from West Valley would be transported either to SRS or to Hanford, and HLW canisters would continue to be stored at Hanford, SRS, and INEEL until acceptance at the geologic repository. Under the centralized storage alternative, canisters would be transported from West Valley, INEEL, and SRS to Hanford, where they would be stored until acceptance at a geologic repository.</p>	<p>Describes regionalized and centralized sites based on available site-specific data and existing and planned storage facilities for HLW canisters. Impacts evaluated include health risks (includes transportation), air quality, water resources, ecological resources, economics, population, environmental justice, land use, infrastructure, cultural resources, and costs.</p>

Table 7-1. Documents that address centralized or regionalized storage of spent nuclear fuel and high-level radioactive waste^a (page 4 of 5).

Title and scope of storage analysis	Environmental and other considerations
<p><i>Environmental Report for the Private Fuel Storage Limited Liability Company's (PFS) Proposed Independent Spent Fuel Storage Installation (ISFSI) License Application (DIRS 103436-PFS 1997, all)</i></p> <p>Evaluates the impacts of a privately owned dry fuel storage facility proposed to be built in western Utah on the Skull Valley Goshute Indian Reservation. The facility would receive and store as much as 40,000 MTHM from several commercial nuclear reactor plants. In June of 2000, the NRC published a Draft EIS to support its licensing process for this facility.</p>	<p>Provides detailed descriptions and environmental impact analyses associated with construction and operation of the site and transportation corridors for geography, land use, and demography; ecological resources; climatology and meteorology (including air quality); hydrological resources; mineral resources; seismology; socioeconomics (including environmental justice analysis); noise and traffic; regional historic and cultural resources; scenic and natural resources; background radiological characteristics; and transportation (radiological and nonradiological impacts). Addresses installation siting and design alternatives based on several specific evaluation criteria (geography and demography; ecology; meteorology; hydrology; geology; regional historic/archaeological/architectural/scenic, cultural/natural features; noise; radiological characteristics).</p>
<p><i>Centralized Interim Storage Facility Topical Safety Analysis Report (DIRS 103375-DOE 1998, all)</i></p> <p>Analyzes an above-ground temporary storage facility for up to 40,000 MTHM of commercial reactor spent nuclear fuel. The non-site-specific analysis concludes that DOE could construct and operate the commercial interim storage facility in a manner that protects public health and safety.</p>	<p>Describes generic site characteristics and design criteria developed to bound, to the extent possible, site-specific values once a CISF is selected. Generic site characteristics include meteorology, surface hydrology, geology, and seismology. Principal design parameters evaluated for normal and accident conditions include type of fuel, storage systems, fuel characteristics, tornado (wind and missile load), straight wind, floods, precipitation, snow and ice, seismicity (ground motion and surface faulting), volcanic eruption (ash fall), explosions, aircraft impact, proximity to uranium fuel cycle operations, ambient temperature, solar load, confinement, radiological protection, nuclear criticality, decommissioning, materials handling, and retrieval capability.</p>

Table 7-1. Documents that address centralized or regionalized storage of spent nuclear fuel and high-level radioactive waste^a (page 5 of 5).

Title and scope of storage analysis	Environmental and other considerations
<p><i>Draft Environmental Impact Statement for the Construction and Operation of an Independent Spent Fuel Storage Installation on the Reservation of the Skull Valley Band of Goshute Indians and the Related Transportation Facility in Tooele County, (DIRS 152001-NRC 2000, all)</i></p> <p>Evaluates the impacts of a privately owned dry fuel storage facility proposed to be built in western Utah on the Skull Valley Goshute Indian Reservation. The facility would receive and store as much as 40,000 MTHM from several commercial nuclear reactor plants.</p>	<p>Provides detailed descriptions and environmental impact analyses associated with construction and operation of the site and transportation corridors for geography, land use, and demography; ecological resources; climatology and meteorology (including air quality); hydrological resources; mineral resources; seismology; socioeconomic (including environmental justice analysis); noise and traffic; regional historic and cultural resources; scenic and natural resources; background radiological characteristics; and transportation (radiological and nonradiological impacts). Addresses installation siting and design alternatives based on several specific evaluation criteria (geography and demography; ecology; meteorology; hydrology; geology; regional historic/archaeological/architectural/scenic, cultural/natural features; noise; radiological characteristics). Provides impact analyses for the No-Action Alternative where NRC would not approve the license application to construct and operate the proposed storage facility and utilities would continue to store spent nuclear fuel at their reactor sites until it is shipped to a permanent geological repository.</p>

a. Abbreviations: ISFS = independent spent fuel storage; ORR = Oak Ridge Reservation; MRS = monitored retrievable storage; TVA = Tennessee Valley Authority; INEEL = Idaho National Engineering and Environmental Laboratory; SRS = Savannah River Site; FRR = Foreign Research Reactor; HLW = high-level radioactive waste; MTHM = metric tons of heavy metal; NRC = U.S. Nuclear Regulatory Commission; CISF = centralized interim storage facility.

Chapter 2 describes the scenarios more fully. Appendix K contains detailed descriptions of the assumptions for each scenario. For consistency, the No-Action analysis considered the same spectrum of environmental impacts as the analysis of the Proposed Action. However, because of the DOE commitment to manage spent nuclear fuel and high-level radioactive waste safely and the uncertainties typical in predictions of the outcome of complex physical and biological phenomena over long periods, DOE decided to focus the No-Action analysis on the short- and long-term health and safety of workers and members of the public.

To ensure a consistent comparison with the Proposed Action for the cumulative effects analysis, the analysis included the impacts of the continued storage of spent nuclear fuel and high-level radioactive waste in excess of 70,000 metric tons of heavy metal (MTHM). This additional material, with the 70,000 MTHM under the Proposed Action (collectively called Module 1), includes 105,000 MTHM of commercial spent nuclear fuel, 2,500 MTHM of DOE spent nuclear fuel, and 22,280 canisters of high-level radioactive waste.

In view of the almost unlimited possible future states of society and the importance of these states to future risk and dose, the National Research Council recommended the use of a particular set of assumptions about the biosphere (for example, how people get their food and water and from where) for compliance calculations such as those performed to evaluate long-term repository performance. Further, the National Research Council recommended the use of assumptions that reflect current technologies and living patterns (DIRS 100018-National Research Council 1995, p. 122). For consistency with the methods used to analyze environmental impacts from the proposed repository, the No-Action analysis selected current technologies and living patterns for the long-term impact evaluation, even though they might not represent an accurate prediction of future conditions.

**DEFINITION OF
METRIC TONS OF HEAVY METAL**

Quantities of spent nuclear fuel are traditionally expressed in terms of *metric tons of heavy metal* (typically uranium), without the inclusion of other materials such as cladding (the tubes containing the fuel) and structural materials. A metric ton is 1,000 kilograms (1.1 tons or 2,200 pounds). Uranium and other metals in spent nuclear fuel (such as thorium and plutonium) are called *heavy metals* because they are extremely dense; that is, they have high weights per unit volume. One metric ton of heavy metal disposed of as spent nuclear fuel would fill a space approximately the size of a typical household refrigerator.

Under Scenario 1, 77 sites around the country would store spent nuclear fuel and high-level radioactive waste. For this scenario, the analysis assumed that institutional control for at least 10,000 years would ensure regular maintenance and continuous monitoring at the facilities, which would safeguard the health and safety of facility employees, surrounding communities, and the environment. All maintenance, including routine industrial maintenance and maintenance unique to a nuclear materials storage facility, would be performed under standard operating procedures or best management practices to ensure minimal releases of contaminants (industrial and nuclear) to the environment and minimal exposures to workers and the public. With institutional control, the facilities would be maintained to ensure that workers and the public received adequate protection in accordance with current Federal regulations such as 10 CFR Part 20 and Part 835 and DOE Order requirements (see Chapter 11, Tables 11-1, 11-3, and 11-4).

In addition, the Scenario 1 analysis assumed that storage facilities would undergo replacement every 100 years and would undergo major repairs halfway through the first 100-year cycle, because the storage facilities at any site would be built for a facility life of less than 100 years. (Federal regulations [10 CFR 72.42(a)] require license renewal every 20 years.) Figure 7-1 shows facility timelines for Scenarios 1 and 2.

DOE and commercial organizations intend to maintain control of the nuclear storage facilities as long as necessary to ensure public health and safety. However, to provide a basis for evaluating the upper limits of potential adverse human health impacts, Scenario 2 assumes no effective institutional control of the storage facilities after approximately the first 100 years. Therefore, after about 100 years and up to 10,000 years, the scenario assumes that spent nuclear fuel and high-level radioactive waste storage facilities at 72 commercial sites and 5 DOE sites would begin to deteriorate and that the radioactive materials in the spent nuclear fuel and high-level radioactive waste would eventually be released to the environment, contaminating the local soil, surface water, and groundwater. Appendix K contains the details of this long-term analysis.

For this environmental impact statement (EIS), DOE performed analyses to 10,000 years from the present. To parallel the repository analysis, the No-Action analysis considered both short- and long-term impacts. Short-term impacts would be those experienced during about the first 100 years, and long-term impacts would be those experienced during the remaining 9,900 years. Short-term impacts would be the

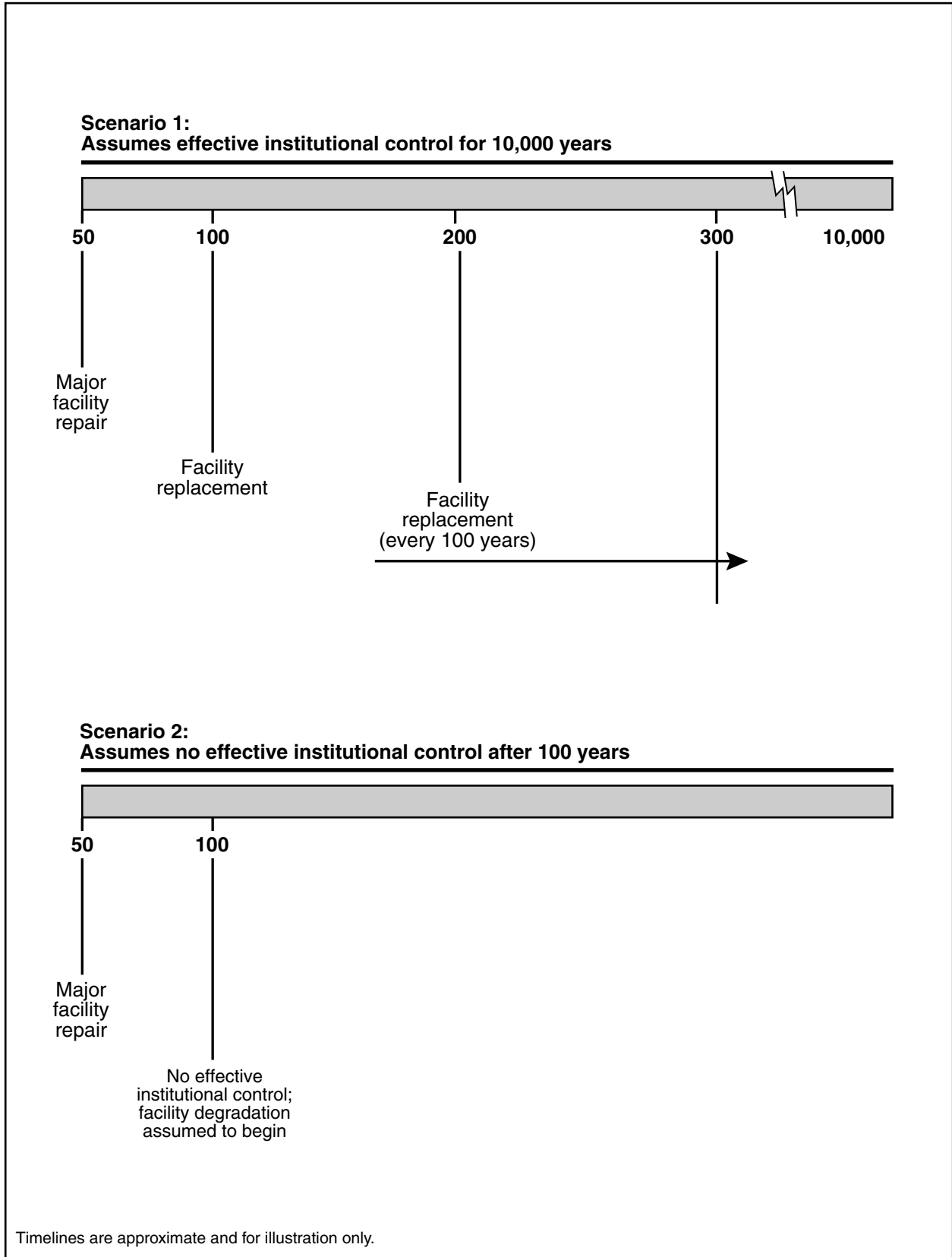


Figure 7-1. Facility timeline assumptions for No-Action Scenarios 1 and 2.

same under Scenarios 1 and 2 because both scenarios assume institutional control during this period. The short-term No-Action Alternative impacts include those resulting from the termination of activities at Yucca Mountain and decommissioning and reclamation of the site, so there would be no long-term impacts at the Yucca Mountain site. In addition, the short-term No-Action Alternative impacts at Yucca Mountain would be the same for both scenarios.

Impacts at the 77 sites after approximately 100 years (long-term) under Scenario 1 primarily would affect facility workers. Long-term impacts at the storage sites after approximately 100 years under Scenario 2 would affect only members of the public because the facility would close and there would be no workers (Scenario 2 assumes no effective institutional control after about 100 years).

To permit a comparison of both short- and long-term impacts from the construction, operation and monitoring, and eventual closure of a proposed repository at Yucca Mountain and from the No-Action Alternative, DOE took care to maintain as much consistency as possible in the methods used to analyze environmental impacts from the proposed repository and the No-Action Alternative. Important consistencies include the following:

- Identical spent nuclear fuel and high-level radioactive waste inventories:
 - Proposed Action: 63,000 metric tons of heavy metal (MTHM) of commercial spent nuclear fuel, 2,333 MTHM of DOE spent nuclear fuel, 8,315 canisters of high-level radioactive waste, and surplus weapons-usable plutonium (as mixed-oxide fuel or immobilized plutonium)
 - Module 1: Proposed Action materials plus an additional 42,414 MTHM of commercial spent nuclear fuel, 167 MTHM of DOE spent nuclear fuel, and 13,965 canisters of high-level radioactive waste resulting in a total of 105,000 MTHM of commercial spent nuclear fuel, 2,500 MTHM of DOE spent nuclear fuel, and 22,280 canisters of high-level radioactive waste.

This inventory includes surplus plutonium in the form of mixed-oxide fuel or immobilized plutonium (see Appendix A, Figure A-2).

- Identical evaluation periods of 100 years (short-term impacts) and of 100 to 10,000 years (long-term impacts)
- Consistent spent nuclear fuel and high-level radioactive waste corrosion and dissolution models
- Identical radiation dose and risk conversion factors
- Similar assumptions regarding the habits and behaviors of future population groups (that is, they would not be greatly different from those of populations today)

Since issuing the Draft EIS, DOE has continued to evaluate design features and operating modes that would improve long-term repository performance and reduce uncertainty. The result of the design evolution process was the development of the flexible design (DIRS 153849-DOE 2001, all), which was evaluated in the Supplement to the Draft EIS. This design focuses on controlling the temperature of the rock between waste emplacement drifts. As a result of these design changes, this Final EIS evaluates a range of repository operating modes (higher- to lower-temperature). The lower-temperature operating mode has the flexibility to remain open and under *active institutional control* for up to 300 years after emplacement. Although Chapter 4 of this EIS includes an evaluation of impacts for this period, DOE did not evaluate the 300-year institutional control case for the No-Action Alternative. The primary reason for not updating this part of the analysis was because if the institutional control period for the analysis of the No-Action Alternative were extended to 300 years, the short-term environmental impacts would have

INSTITUTIONAL CONTROL

Institutional control implemented by commercial utilities and DOE provides monitoring and maintenance of storage facilities to ensure that radiological releases to the environment and radiation doses to workers and the public remain within Federal limits and DOE Order requirements. Having attained this goal, institutional control ensures the maintenance of incurred doses as low as reasonably achievable, taking social and economic factors into account. Because the future course of action taken by the Nation and by commercial utilities would be uncertain if Yucca Mountain were not recommended as a repository site, the continued storage analysis evaluated two hypothetical scenarios with different assumptions about institutional control to bound potential environmental impacts.

The assumption for Scenario 1 is that DOE and commercial utilities would maintain institutional control of the storage facilities to ensure minimal releases of contaminants to the environment for at least 10,000 years.

Scenario 2 assumes no effective institutional control after approximately 100 years. DOE based the choice of 100 years on a review of generally applicable U.S. Environmental Protection Agency regulations for the disposal of spent nuclear fuel and high-level radioactive waste (40 CFR Part 191), U.S. Nuclear Regulatory Commission regulations for the disposal of low-level radioactive material (10 CFR Part 61), and the National Research Council report on standards for the proposed Yucca Mountain Repository (DIRS 100018-National Research Council 1995, p. 106), which generally discount the consideration of institutional control for longer periods in performance assessments for geologic repositories.

increased by as much as 3 times. DOE did not want to appear to overstate the impacts from the No-Action Alternative.

Since the publication of the Draft EIS, DOE modified the spent nuclear fuel cladding corrosion rates and failure mechanisms used in the performance analysis in Chapter 5 of the Final EIS. DOE did not update these models for the No-Action Alternative Scenario 2 analysis because the outcome would have been an increase in the long-term radiation doses and potential health impacts, however, the increase would be within the uncertainties discussed in Appendix K, Section K.4. In addition, the radionuclide inventories for commercial spent nuclear fuel were updated for the Final EIS (see Appendix A, Tables A-8 and A-9) to reflect the higher initial enrichments and burnup projected for commercial nuclear facilities. Although these revised inventories were used to estimate potential short-term repository impacts in the Final EIS (Chapter 4), DOE chose not to update the No-Action inventories because, again, the effect on the outcome would be about a 15-percent increase in health impacts in this chapter.

Affected populations for the No-Action Alternative were, in general, based on 1990 census estimates and not projected to 2035 as was done for the Proposed Action. However, if the population across the Nation had been projected to 2035, the collective impacts resulting from radiation exposure would have increased by less than a factor of 1.5, which is the average expected increase in national population from 1990 to 2035 (DIRS 152471-Bureau of the Census 2000, all).

7.1 Short-Term Impacts in the Yucca Mountain Vicinity

Chapter 3, Section 3.3, discusses the conditions at the sites that formed the basis for identifying potential impacts associated with the No-Action Alternative. The conditions include the relatively small incremental impacts resulting from continued characterization activities in the Yucca Mountain vicinity until 2002. Under the No-Action Alternative, DOE would terminate characterization activities at the site

and would begin site decommissioning and reclamation. Decommissioning and reclamation would include dismantling and removing structures, shutting down some surface facilities, and rehabilitating land disturbed during characterization activities. DOE would salvage usable equipment and materials. Drill holes would be sealed, subsurface drifts and rooms would be left in place, and the portals would be gated. The piles of excavated rock from the tunnel would be landscaped. Areas disturbed by surface studies or used as laydown yards, borrow areas, or the like would be restored. Holding ponds would be backfilled or capped. DOE would not remove foundations or infrastructure such as access roads, parking lots, and sewage systems. The analysis assumed that reclamation activities would take about 1 year. Chapter 2, Section 2.2, describes the No-Action Alternative at Yucca Mountain.

The short-term impacts from reclamation of the Yucca Mountain site would occur regardless of the No-Action Alternative scenario and would be the same for both scenarios.

7.1.1 LAND USE AND OWNERSHIP

Land ownership and control could revert to the original controlling authority.

Under the No-Action Alternative, decommissioning and reclamation would begin as soon as practicable at the Yucca Mountain site, which DOE anticipates would happen in 2002. No new land would be required to support the decommissioning and reclamation activities. Because DOE stored topsoil and material from the mountain during site characterization, it would need no additional land to provide soil for reclaiming the material taken from the mountain or for backfilling holding ponds or the reclamation of other previously disturbed areas. Therefore, the No-Action Alternative would not require the disturbance of additional land at the site. The disturbed land would be restored to its approximate preconstruction condition about 100 years earlier than would occur under the Proposed Action.

7.1.2 AIR QUALITY

Transient effects on air quality would result from the exhausts of the heavy equipment that DOE would use during the decommissioning and reclamation activities that the Department expects to complete over a 1-year period. Recontouring and revegetation activities would generate dust containing particulate matter less than 10 micrometers in diameter (PM₁₀). Impacts on air quality would be about the same as those associated with the construction phase during the Proposed Action for the flexible design, as discussed in Chapter 4, Section 4.1.2, because less land would be disturbed by fewer vehicles during decommissioning and reclamation activities. Because the air quality impacts described in Section 4.1.2 represent a small fraction of the regulatory limit (that is, less than 10 percent of regulatory limits), the No-Action Alternative would not adversely affect air quality.

7.1.3 HYDROLOGY

7.1.3.1 Surface Water

The No-Action Alternative would not adversely affect surface water. During decommissioning and reclamation, adherence to such best management practices as stormwater pollution prevention plans would ensure that cleared areas and exposed earth would be seeded, graveled, or paved to control runoff and minimize soil erosion. To prevent contamination from heavy equipment, workers would monitor the equipment for leaks and would contain and clean up inadvertent spills of industrial fluids following established spill prevention and cleanup plans. DOE would dismantle and remove most surface structures, equipment, and building materials (DIRS 102188-YMP 1995, p. 2-8), including such items as fuel storage tanks and facilities where petroleum products or potentially hazardous materials like paints and solvents were stored before removal. Hazardous materials removed or generated during decommissioning would be taken from the site and reused, recycled, or disposed of in accordance with

applicable regulations (DIRS 102188-YMP 1995, p. 2-8). After closure, contaminant sources would be gone so there could be no movement of contaminants to surface water. The analysis assumed that reclamation activities would be complete about 1 year after the decision to implement the No-Action Alternative, which DOE anticipates would occur in 2002.

As part of the reclamation activities, DOE would recontour the landscape to match its precharacterization conditions, ensuring natural drainage patterns. Because the North and South Portal ramps of the Exploratory Studies Facility slope upward to prevent ingress of surface water, they would not appreciably affect natural drainage patterns. Seeding and other erosion control measures would ensure normal infiltration rates. Under the No-Action Alternative, DOE anticipates that the restoration of natural drainage patterns would be complete about 100 years earlier than under the Proposed Action.

7.1.3.2 Groundwater

The No-Action Alternative would not adversely affect groundwater. DOE would remove all sources of contaminants (such as petroleum products and potentially hazardous materials like paints and solvents) from the site. The entrance ramps of the open portals of the Exploratory Studies Facility are sloped such that surface water would drain away from the openings. During reclamation activities (which would take about 1 year), the Exploratory Studies Facility portals would be closed.

7.1.4 BIOLOGICAL RESOURCES AND SOILS

Approximately 1.4 square kilometers (350 acres) of habitat has been disturbed; most of the disturbance is associated with the Exploratory Studies Facility, the storage area for the material removed from the tunnel, the topsoil storage area, borrow pits, boreholes, trenches, and roads. Site reclamation activities would include removal of structures and equipment, soil stabilization, and revegetation plantings at many of the disturbed sites (DIRS 102188-YMP 1995, all). Proper soil stabilization would prevent erosion. Once the area was reclaimed, stabilized, and planted with natural vegetation, and once activities at the site decreased, the precharacterization floral and faunal diversity would begin to reestablish itself. Some animal species could take advantage of abandoned tunnels for shelter; for example, the tunnels could provide attractive roosting and nesting sites for bats. Individuals of the threatened desert tortoise species could be adversely affected during the decommissioning and reclamation of the site. The No-Action Alternative would have no other adverse effects on biological resources or soils. In addition, the reclamation would result in the restoration of 1.4 square kilometers of habitat.

7.1.5 CULTURAL RESOURCES

The potential effects of other uses of the Yucca Mountain site on cultural resources are not known because no other uses have been identified; therefore, no assessment of the effects is possible. If the land were to revert to the previous controlling authorities, the stewardship of cultural resources would be consistent with applicable policies, regulations, and procedures.

Because no additional land would be required for decommissioning and reclamation activities, disturbances to cultural resources on undisturbed land in the area would be unlikely. Leaving access roads in place could have an adverse impact on cultural resources if the site boundaries are not secure. Preserving the integrity of important archaeological sites and resources important to Native Americans could be difficult if the public had increased access to the site.

7.1.6 SOCIOECONOMICS

Many of the repository workers would shift to decommissioning and reclamation tasks. An average annual workforce of about 1,800 would complete decommissioning and reclamation tasks at the

repository site. After decommissioning and reclamation, the Nevada Test Site would assume the responsibility of preventing inadvertent entry to the North and South Portal areas. A small workforce would protect these areas after reclamation.

After the 1-year decommissioning and reclamation period, the decommissioning and reclamation workforce, along with about 1,400 project-related workers employed away from the repository site, would lose their jobs. The total direct employment reduction, therefore, would be about 3,200 at the completion of decommissioning and reclamation. For every direct job lost, about 0.46 indirect job would also be lost (DIRS 104508-CRWMS M&O 1999, all). *Indirect jobs* are those created as a result of direct employment; examples would include jobs that provide essential services, such as medical and police protection, to the individuals directly employed by the project. Therefore, the overall impact of the No-Action Alternative would be the loss of approximately 4,700 jobs in the region of influence.

As stated in Chapter 3, Section 3.1.7.1, approximately 79 percent of workers at the Yucca Mountain site reside in Clark County, 19 percent reside in Nye County, and less than 1 percent reside in Lincoln County or elsewhere. Thus, ending characterization activities would have the greatest potential impact in Clark County. If the region (Clark, Lincoln, and Nye Counties) continued to add about 2,800 new jobs every month, impacts would be offset by continued economic growth (Chapter 3, Section 3.1.7.2). Therefore, terminating site characterization activities would have a very minor impact on socioeconomic factors.

The cessation of repository activities would result in the loss of payments by the Federal Government in lieu of taxes. Nye County collects most of the monies associated with the repository project. The 1997 Nye County budget totaled approximately \$83.8 million (county government and school district). During the same period, Nye County received approximately \$5.4 million as payment in lieu of taxes (DIRS 105001-CRWMS M&O 1999, all).

7.1.7 OCCUPATIONAL AND PUBLIC HEALTH AND SAFETY FOR ROUTINE OPERATIONS

Chapter 2, Section 2.2.1, describes the actions DOE would take at Yucca Mountain under the No-Action Alternative. During the decommissioning and reclamation phase, these actions would expose workers and members of the public to the nonradioactive and radioactive contaminants discussed in Chapter 4, Section 4.1.3.1. In addition, these actions would place workers at risk for occupational (industrial safety) incidents such as illnesses, injuries, and fatalities. Appendix F, Section F.2.2.2, describes the statistics used to estimate health and safety impacts from industrial safety incidents. Because the activities that workers would perform under the No-Action Alternative would involve risks similar to those during the construction and closure phases of the Proposed Action, DOE used these statistics to estimate worker health impacts.

Worker exposures to nonradioactive contaminants of concern (diesel engine exhaust and mineral dusts potentially containing respirable erionite and crystalline silica) during decommissioning and reclamation activities would be limited by administrative and engineering means. Exposures would be maintained below occupational levels that could affect worker health adversely, as specified by the Occupational Safety and Health Administration and detailed in the project health and safety plan (DIRS 105032-CRWMS M&O 1999, all). Accordingly, worker exposures to nonradioactive contaminants would not contribute to adverse health impacts.

Tables 7-2 and 7-3 summarize the estimated total impacts from workplace industrial hazards and from radiological exposure, respectively, for reclamation activities. Table 7-4 summarizes impacts to members of the public.

Involved and noninvolved worker group losses under the No-Action Alternative would be about 94 total recordable cases of injury and illness, resulting in about 45 lost workday cases and no fatalities (Table 7-2).

Worker population radiation exposures during the year of decommissioning and reclamation activities would result from exposure to radioactive radon decay products that would emanate from the tunnel's rock matrix and from ambient radiation. Exposures to the subsurface workers could result in a collective dose of about 150 person-rem (Table 7-3). Doses to the maximally exposed involved subsurface worker and noninvolved worker could be as high as about 260 millirem and 70 millirem, respectively.

Table 7-2. Estimated industrial safety impacts for surface and subsurface workers during decommissioning and reclamation activities at Yucca Mountain.^a

Group	Total recordable cases	Lost workday cases	Fatalities
Involved workers	80	38	0
Noninvolved workers	13	7	0
Totals	94	45	0

a. Source: For impact statistics, Appendix F, Tables F-9 and F-10 (1 year of construction, higher-temperature operating mode, uncanistered packaging scenario).

Table 7-3. Estimated radiation doses and health effects for surface and subsurface workers from decommissioning and reclamation activities at Yucca Mountain.^{a,b}

Group	Maximally exposed individual (millirem)	LCF ^c risk to the maximally exposed individual	Collective worker dose ^d (person-rem)	LCF ^e
Involved workers	260	0.00010	140	0.055
Noninvolved workers	70	0.00027	7.4	0.0030
Totals	NA^f	NA	150	0.057

- a. Source: Appendix F, Table F-11; data adjusted for 1 year of construction activity.
- b. The impacts listed would be the result of 1 year of decommissioning and reclamation activities; adapted from construction phase impacts. Worker doses would result from exposure to radon and other terrestrial radiation sources.
- c. LCF = latent cancer fatality.
- d. The calculation of doses and health effects assumes no worker rotation for exposure control purposes.
- e. Expected number of cancer fatalities for populations. Based on a risk of 0.0004 latent cancer per rem for workers (DIRS 101857-NCRP 1993, p. 112).
- f. NA = not applicable.

Public radiation exposures during decommissioning and reclamation would result from radon emissions from the subsurface facilities. These exposures could result in an annual dose to the hypothetical maximally exposed individual, about 18 kilometers (11 miles) south of the repository, of 0.43 millirem. The maximum collective dose to the projected population of 76,000 within 80 kilometers (50 miles) would be about 1.7 person-rem (Table 7-4).

Table 7-4. Estimated public radiation doses and health effects from decommissioning and reclamation activities at Yucca Mountain.^a

Group	Maximally exposed individual (millirem per year)	Annual increase in risk for contracting an LCF ^b	Collective public dose ^c (person-rem)	LCF
Public	0.43	0.00000022	1.7	0.00085

- a. The impacts listed would be the result of 1 year of decommissioning and reclamation activities (Table 4-2, higher-temperature operating mode, which was assumed to equate to 1 year of initial construction activities).
- b. LCF = latent cancer fatality; expected number of cancer fatalities for populations. Based on a risk of 0.0005 latent cancer per rem for members of the public (DIRS 101857-NCRP 1993, p. 112), and a life expectancy of 70 years for a member of the public.
- c. The collective dose to 76,000 individuals living within 80 kilometers (50 miles) would be from radon emissions from the subsurface facilities.

The increased likelihood of the maximally exposed individual worker experiencing a latent cancer fatality would be very small.

7.1.8 ACCIDENTS

Under the No-Action Alternative, DOE would not ship spent nuclear fuel and high-level radioactive waste to Yucca Mountain, and there would be only limited quantities of nonradioactive hazardous or toxic substances. Therefore, accident impacts would be limited to those from traffic and industrial hazards.

Table 7-2 lists impacts from industrial accident scenarios and Section 7.1.14 discusses impacts from traffic accident scenarios.

7.1.9 NOISE

Noise levels during decommissioning and reclamation activities would be no greater than those of site characterization activities. After the decommissioning and reclamation activities were complete, ambient noise would return to levels consistent with a desert environment where natural phenomena account for most background noise (see Chapter 3, Section 3.1.9.1). The No-Action Alternative would not adversely affect the noise levels of the Yucca Mountain region.

7.1.10 AESTHETICS

Site decommissioning and reclamation activities would improve the scenic value of the site. Borrow pits and holding ponds would be filled or graded, stabilized, and revegetated. Most structures would be removed down to their foundations. The North and South Portals would be gated. The surface area of these disturbed areas would represent a small fraction of the total surface area of the repository site and, therefore, would be unlikely to cause adverse impacts to the overall scenic value of the area. Under the No-Action Alternative, the site would be returned to a state as close as possible to the predisturbed state; therefore, DOE would not expect adverse impacts to the scenic value of the area. Site restoration would occur about 100 years earlier than under the Proposed Action.

7.1.11 UTILITIES, ENERGY, AND MATERIALS

Decommissioning and reclamation activities would consume electricity, diesel fuel, and gasoline. Much equipment and many materials would be salvaged and recycled. DOE would recycle buildings as practicable. After the site closed, minimal surveillance activities would require some electricity and gasoline. The No-Action Alternative would not adversely affect the utility, energy, or material resources of the region.

7.1.12 WASTE MANAGEMENT

The decommissioning and reclamation of the Yucca Mountain site would generate some waste requiring disposal, including sanitary sewage, sanitary and industrial solid waste, small amounts of demolition debris, and very small amounts of hazardous waste. DOE would dispose of the wastes as it has during the site characterization activities.

DOE would minimize waste generation by salvaging most of the equipment and many materials and redistributing them to other DOE sites or selling them at public auction. Remaining chemical supplies would be redistributed through the DOE excess program, which collects equipment and materials no longer in use for reassignment to other DOE sites or Federal facilities, donation to state governments, or sale to the public. DOE would preserve, rather than demolish, certain facilities that could be useful in the future, such as the electrical distribution and water supply systems. Sanitary sewage would be disposed

of in the onsite septic system. At the end of reclamation activities, DOE would cap the inlets to the septic system and leave the system in place. DOE would dispose of sanitary and industrial solid waste and demolition debris in existing Nevada Test Site landfills, where disposal capacity would be available for about 70 years (DIRS 101803-DOE 1995, p. 8).

7.1.13 ENVIRONMENTAL JUSTICE

An examination of analyses from other technical disciplines associated with terminating characterization and construction activities at Yucca Mountain and decommissioning and reclaiming the site shows no potential for large impacts in areas other than cultural resources and socioeconomics. The cultural resources analysis identified the possibility that increased public access (if roads were left open and site boundaries were not secure) could threaten the integrity of archaeological sites and resources important to Native Americans. The socioeconomic analysis identified a potential loss of as many as 4,700 jobs (see Section 7.1.6).

Disproportionate impacts to minority or low-income populations from potential job losses would not be expected because there is no reason to believe that minority or low-income employees would be any more likely to be affected by job loss.

7.1.14 TRAFFIC AND TRANSPORTATION

Fatalities from project-related traffic would be unlikely during decommissioning and reclamation. As a gauge of the probability of 1 fatality, decommissioning and reclamation activities would require about 1 year to complete, or about one-fifth of the time to construct the repository. The analysis in Appendix J estimated less than 0.7 fatality from traffic accidents during repository construction, so less than 0.15 traffic fatality would be likely during decommissioning and reclamation (see Appendix J, Tables J-64 and J-65, for details).

7.1.15 SABOTAGE

There would be no nuclear materials at the Yucca Mountain site, so sabotage concerns would not be pertinent.

7.2 Commercial and DOE Sites

This section analyzes short- and long-term impacts of continued storage of spent nuclear fuel and high-level radioactive waste at 72 commercial and 5 DOE sites for 10,000 years (the period considered for the Proposed Action). The analysis includes No-Action Scenarios 1 and 2.

The following paragraphs discuss short-term impacts under No-Action Scenario 1. Because the analysis assumed that all sites would maintain institutional control for the first approximately 100 years, the short-term impacts for Scenarios 1 and 2 would be the same. For consistency with the Proposed Action, this analysis assumed the No-Action scenarios would begin in 2002. This analysis considered the Idaho National Engineering and Environmental Laboratory to be a site for naval spent nuclear fuel because the Laboratory stores such fuel.

Under the No-Action Alternative, commercial utilities would manage their spent nuclear fuel at 72 facilities. DOE would manage its spent nuclear fuel and high-level radioactive waste at five facilities (the Hanford Site, the Idaho National Engineering and Environmental Laboratory, Fort St. Vrain (spent nuclear fuel only) the West Valley Demonstration Project (high-level radioactive waste only), and the Savannah River Site). The No-Action analysis evaluated the DOE spent nuclear fuel and high-level radioactive waste at existing sites or at sites where existing Records of Decisions have placed or will

place these materials. For example, the Record of Decision (60 FR 18589, April 12, 1995) for the Final Supplemental Environmental Impact Statement, Defense Waste Processing Facility (DIRS 103191-DOE 1994, all) decided to complete construction and operate the Defense Waste Processing Facility and associated facilities at the Savannah River Site to pretreat, immobilize, and store high-level radioactive waste. Similarly, the Hanford Site Final Environmental Impact Statement for the Tank Waste Remediation System (DIRS 103214-DOE 1996, all) identified as the preferred alternative ex situ vitrification of high-level radioactive waste with onsite storage until final disposition in a geologic repository. For DOE spent nuclear fuel, the Record of Decision (60 FR 28680, June 1, 1995) for the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement (DIRS 101802-DOE 1995, all) decided that Hanford production reactor fuel would remain at the Hanford Site; aluminum-clad fuel would be consolidated at the Savannah River Site; and non-aluminum-clad fuels (including spent nuclear fuel from the Fort St. Vrain reactor and naval spent nuclear fuel) would be transferred to the Idaho National Engineering and Environmental Laboratory. Therefore, the analysis evaluated DOE aluminum-clad spent nuclear fuel at the Savannah River Site and DOE non-aluminum-clad fuel at the Idaho National Engineering and Environmental Laboratory; most of the Fort St. Vrain spent nuclear fuel at the Colorado generating site; and high-level radioactive waste at the generating sites (the West Valley Demonstration Project, the Idaho National Engineering and Environmental Laboratory, the Hanford Site, and the Savannah River Site).

The No-Action Alternative assumes that the spent nuclear fuel and high-level radioactive waste would be treated, packaged, and stored in a condition ready for shipment to a repository. The amount (inventory) of spent nuclear fuel and high-level radioactive waste considered in this analysis would be the same as that for the Proposed Action—70,000 metric tons consisting of 63,000 MTHM of commercial spent nuclear fuel, 2,333 MTHM of DOE spent nuclear fuel, 8,315 canisters of solidified high-level radioactive waste. The 70,000 MTHM would include surplus plutonium in the form of mixed-oxide fuel and immobilized plutonium. In addition, DOE recognizes that more than 107,000 MTHM of commercial and DOE spent nuclear fuel and more than 22,000 canisters of high-level radioactive waste could require storage if a disposal site is not available. Section 7.3 describes the assumptions and analytical methods used to estimate impacts for the total projected inventory of spent nuclear fuel and high-level radioactive waste, referred to as Inventory Module 1, and evaluates the potential impacts of the continued storage of the total projected inventory of commercial and DOE spent nuclear fuel and high-level radioactive waste.

Storage Packages and Facilities at Commercial and DOE Sites

A number of designs for storage packages and facilities at the commercial and DOE sites would provide adequate protection from the environment for packages containing spent nuclear fuel and high-level radioactive waste. Because it has not selected specific designs for most locations, DOE selected a representative range of commercial and DOE designs for analysis, as described in the following paragraphs. In addition, for purposes of analysis, the No-Action Alternative assumed that the commercial and DOE sites have sufficient land to construct the initial and replacement storage facilities and that the initial construction of all dry storage facilities would be complete and the facilities filled by 2002.

Spent Nuclear Fuel Storage Facilities

Most commercial sites currently store their spent nuclear fuel in water-filled basins (fuel pools) at the reactor sites. Because they have inadequate storage space, some commercial sites have built what are called *independent spent fuel storage installations*, in which they store dry spent nuclear fuel above ground in metal casks or in welded canisters inside reinforced concrete storage modules. Other commercial sites plan to build independent spent fuel storage installations so they can proceed with the decommissioning of their nuclear plants and termination of their operating licenses (for example, the Rancho Seco and Trojan plants). Because commercial sites could elect to continue operations until their fuel pools became full and then cease operations, the EIS analysis initially considered ongoing wet storage in existing fuel pools to be a potentially viable option for spent nuclear fuel storage. However,

dry storage is almost certainly the preferred option for long-term spent fuel storage at commercial sites for the following reasons (DIRS 101899-NRC 1996, pp. 6-76 and 6-85):

- Dry storage is a safe economical method of storage.
- Fuel rods in dry storage are likely to be environmentally secure for long periods.
- Dry storage generates minimal, if any, low-level radioactive waste.
- Dry storage units are simpler and easier to maintain.

Accordingly, this EIS assumes that all commercial spent nuclear fuel would be stored in dry configurations in independent spent fuel storage installations at existing locations (Figure 7-2 is a photograph of a typical independent spent fuel storage installation). This assumption includes spent nuclear fuel at sites that no longer have operating nuclear reactors. Although most utilities and DOE have not constructed independent spent fuel storage installations or designed dry storage containers, this analysis evaluates the impacts of storing all commercial and some DOE spent nuclear fuel in horizontal concrete storage modules (Figure 7-3) on a concrete pad at the ground surface. Concrete storage modules have openings that allow outside air to circulate and remove the heat of radioactive decay. The analysis assumed that spent nuclear fuel from both pressurized-water and boiling-water reactors would be stored in a dry storage canister inside the concrete storage module. Figure 7-4 shows a typical dry storage canister, which would consist of a stainless-steel outer shell, welded end plugs, pressurized helium internal environment, and criticality-safe geometry for 24 pressurized-water or 52 boiling-water reactor fuel assemblies.

The combination of the dry storage canister and the concrete storage module would provide safe storage of spent nuclear fuel as long as the fuel and storage facilities were maintained properly. The reinforced concrete storage module would provide shielding against the radiation emitted by the spent nuclear fuel. In addition, the concrete storage module would provide protection from damage resulting from accidents such as aircraft crashes and from natural hazard phenomena such as earthquakes or tornadoes.

This analysis assumed that DOE would store dry spent nuclear fuel at the Savannah River Site, the Idaho National Engineering and Environmental Laboratory, and Fort St. Vrain in stainless-steel canisters inside above-grade reinforced concrete storage modules. In addition, it assumed that the design of DOE above-ground spent nuclear fuel storage facilities would be similar to the independent spent fuel storage installations at commercial sites.

The analysis assumed that DOE would store spent nuclear fuel at Hanford in a dry cask in below-grade storage facilities. DOE would store Hanford N-Reactor fuel in the Canister Storage Building, which would consist of three below-grade concrete vaults with air plenums for natural convective cooling. The vaults would contain vertical storage tubes made of carbon steel. Each storage tube, which would hold two spent nuclear fuel canisters, would be sealed with a shield plug. DOE would cover the vaults with a structural steel shelter.

High-Level Radioactive Waste Storage Facilities

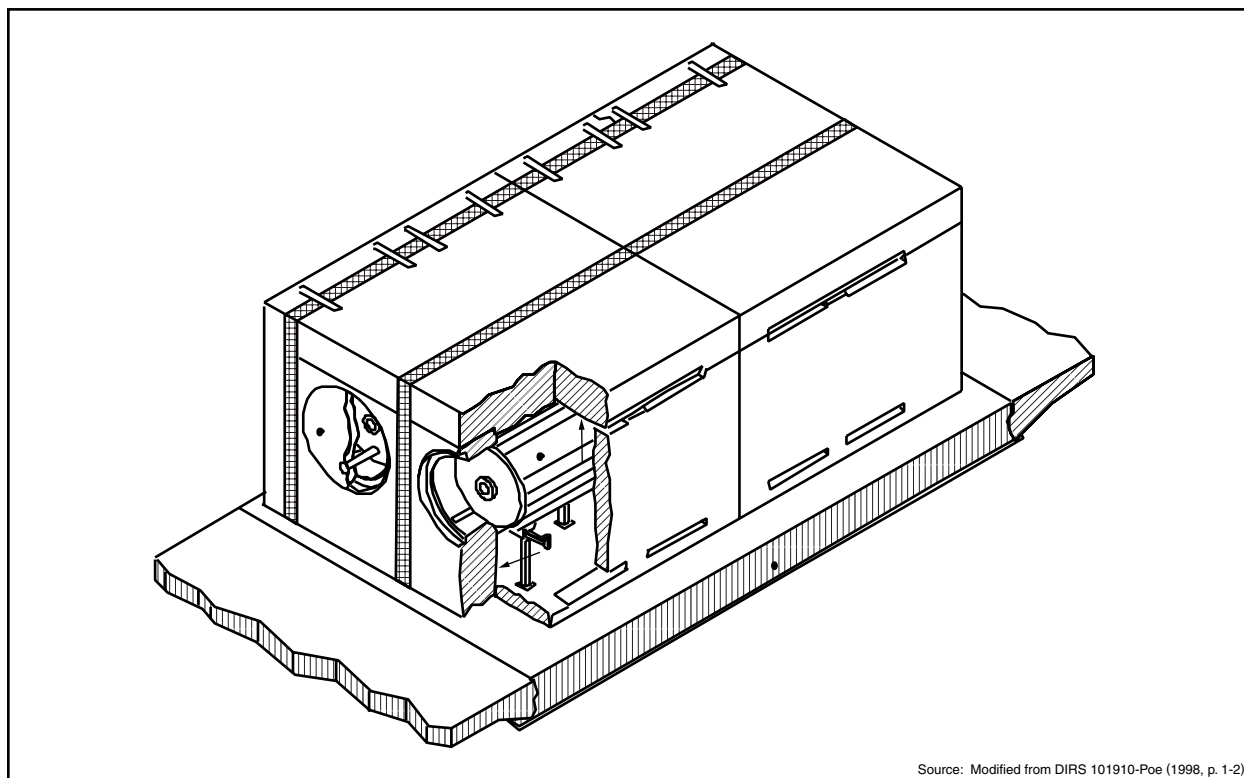
With one exception, this analysis assumed that DOE would store solidified high-level radioactive waste in dry below-grade, high-level radioactive waste storage facilities (Figure 7-5). At the West Valley Demonstration Project, the analysis assumed that DOE would use a dry storage system similar to a commercial independent spent nuclear fuel storage installation for high-level radioactive waste.

A high-level radioactive waste storage facility consists of four areas: below-grade storage vaults, an operating area above the vaults, air inlet shafts, and air exhaust shafts. The canister cavities are galvanized-steel large-diameter pipe sections arranged in a grid. Canister casings are supported by a concrete base mat. Space between the pipes is filled with overlapping horizontally-stepped steel plates that direct most of the ventilation air through the storage cavities.



Independent spent fuel storage installation

Figure 7-2. Typical independent spent fuel storage installation.



Source: Modified from DIRS 101910-Poe (1998, p. 1-2).

Figure 7-3. Spent nuclear fuel concrete storage module.

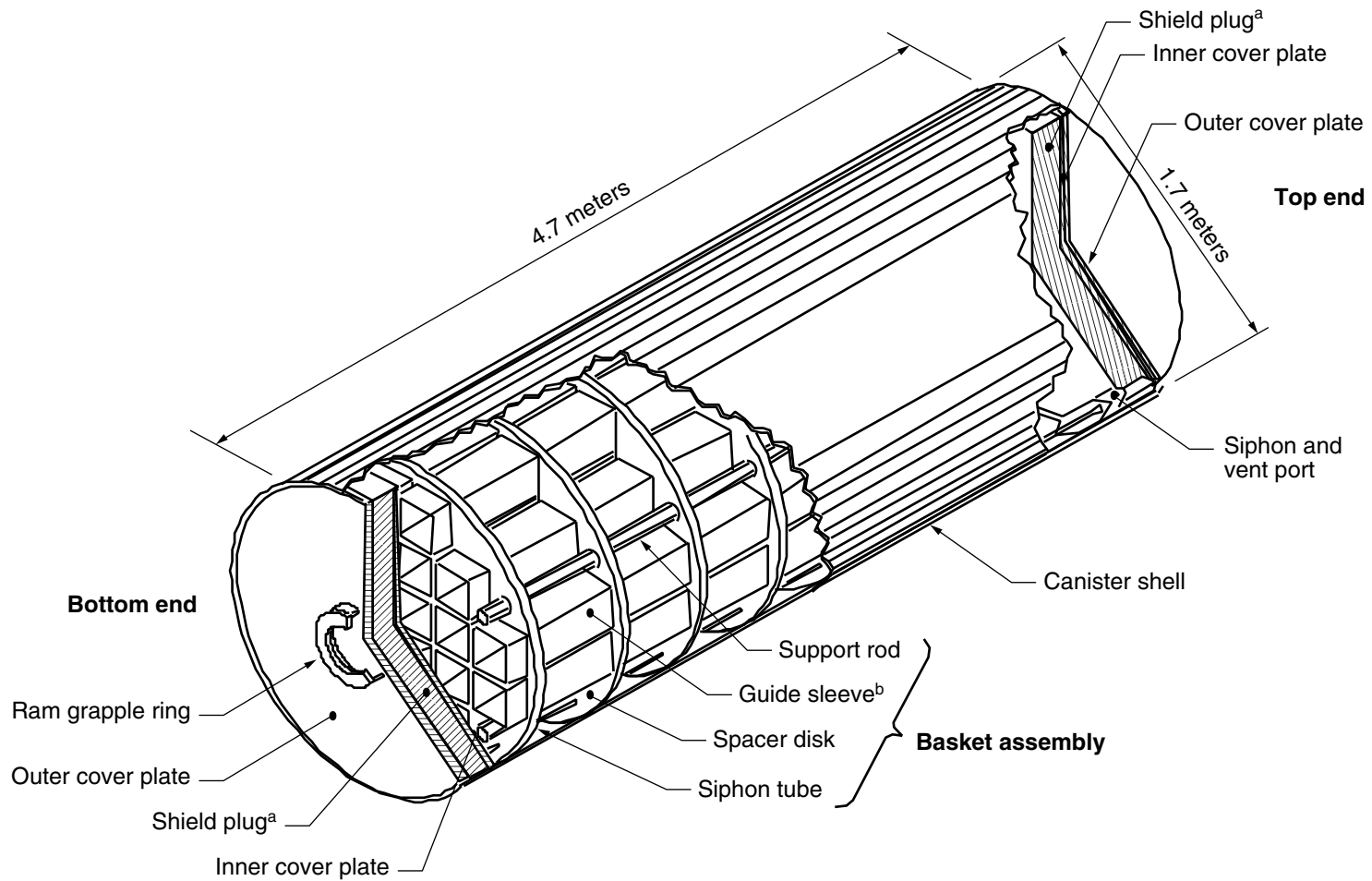
The below-grade storage vault would be below the operating floor, which would be slightly above grade. The storage vault would be designed to withstand earthquakes and tornadoes. In addition, the operating area would be enclosed by a metal building, which would provide weather protection and prevent the infiltration of precipitation. The storage vault would be designed to store the canisters and protect the operating personnel, the public, and the environment for as long as the facilities were maintained. The surrounding earth, concrete walls, and a concrete deck that would form the floor of the operating area would provide radiation shielding. Canister cavities would have individual precast concrete plugs.

Each vault would have an air inlet, air exhaust, and air passage cells. The storage facility's ventilation system would remove the heat of radioactive decay from around the canisters. The exhaust air could pass through high-efficiency particulate air filters before it discharged to the atmosphere through a stack. As an alternative, natural convection cooling without filters could be used. The oversized diameter of the pipe storage cavities would allow air to pass around each cavity.

7.2.1 NO-ACTION SCENARIO 1

Under Scenario 1, 72 commercial sites and 5 DOE sites would store spent nuclear fuel and high-level radioactive waste for 10,000 years. Institutional control, which would be maintained for the entire 10,000-year period, would ensure regular maintenance and continuous monitoring at these facilities that would safeguard the health and safety of facility employees, surrounding communities, and the environment. The spent nuclear fuel and immobilized high-level radioactive waste would be *inert* material encased in durable, robust packaging and stored in above- or below-grade concrete facilities. Release of contaminants to the ground, air, or water would not be expected during routine operations.

DOE and commercial utility workers would perform all maintenance including routine industrial maintenance and maintenance unique to a nuclear materials storage facility under standard operating



All materials 304 stainless steel except as noted.

a. Shield plug would be lead.

b. Borated neutron absorber plate
for boiling-water reactor spent nuclear fuel assemblies.

To convert meters to feet, multiply by 3.2808.

Source: Modified from DIRS 101910-Poe (1998, p. 1-5).

Figure 7-4. Spent nuclear fuel dry storage canister.

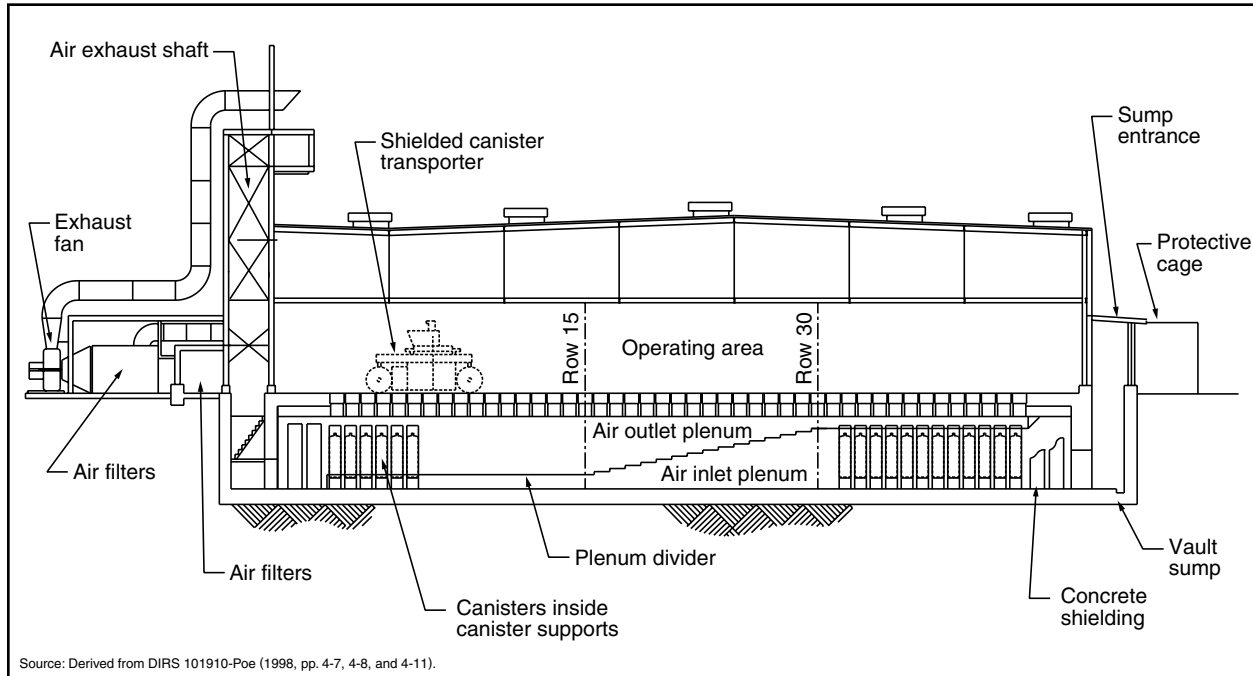


Figure 7-5. Conceptual design for solidified high-level radioactive waste storage facility.

procedures and best management practices to ensure minimal releases of contaminants (industrial and nuclear) to the environment and minimal exposures to workers and the public. This analysis assumed that DOE would manage these facilities in accordance with Departmental rules (10 CFR Part 835) and Orders (see Chapter 11) and that commercial facilities would meet applicable environmental safety and health requirements. It also assumed that storage facilities would require replacement every 100 years and that they would undergo major repairs halfway through the first 100-year cycle. Chapter 2, Section 2.2, provides additional information pertaining to Scenario 1. The following sections treat short- and long-term impacts separately where appropriate.

7.2.1.1 Land Use and Ownership

The storage facilities for spent nuclear fuel and high-level radioactive waste would be at commercial and DOE sites. Facilities would require replacement every 100 years (beginning about 2110), which would occur on land immediately adjacent to the existing facilities. The land required for a storage facility typically would be a few acres, a small percentage of the land available at current sites. An environmental assessment of an independent spent fuel storage installation determined that operation of the facility would require no more land than it occupied (DIRS 101898-NRC 1991, p. 20).

At the end of each 100-year cycle, a new facility constructed next to the old one would contain the spent nuclear fuel or high-level radioactive waste. The old facility would be demolished and the land reclaimed and maintained for the next 100 years. By alternating the facility between two adjacent locations, minimal land would be required.

Storage facilities would be on land owned by either DOE or a utility. Storage at these sites would be unlikely to affect land use and ownership.

7.2.1.2 Air Quality

As a part of routine operations, best management practices and effective monitoring procedures would ensure that any contaminant releases to the air would be minimal and would not exceed current regulatory limits (40 CFR Part 61 for hazardous air pollutant emissions and Part 50 for air quality standards). Therefore, the No-Action Alternative would not produce adverse impacts to air quality during routine operations.

The analysis assumed that the storage facilities would require complete replacement every 100 years. During the construction of the replacement facility, exhaust from construction vehicles would temporarily increase local levels of hydrocarbons, carbon monoxide, and oxides of nitrogen, but these and other atmospheric pollutants would be likely to remain within National Ambient Air Quality Standards (see Chapter 3, Table 3-5). Temporary increases in particulate matter would result from these construction activities. Mitigation measures such as watering unpaved roads would limit the generation of fugitive dust. In addition, after replacement the old site would be seeded, graveled, or paved to reduce air emissions. Detrimental air quality impacts would be short-term, minimal, and transient.

Very small air quality impacts would be likely from repackaging materials removed from dry storage containers that could degrade to the point that they no longer met licensing requirements; these impacts were not included in the overall impact estimates. Long-term dry storage canister degradation would be highly variable and difficult to estimate from site to site, and DOE did not want to overestimate the accompanying air quality impacts from repackaging.

7.2.1.3 Hydrology

7.2.1.3.1 Surface Water

As part of routine operations, best management practices such as stormwater pollution prevention plans and stormwater holding ponds would ensure that, in the unlikely event of an inadvertent contaminant release, contaminants did not reach surface-water systems. Effective monitoring procedures would ensure that operation of the facility did not adversely affect surface waters and that no discharges would contaminate surface waters in excess of drinking water regulatory limits (40 CFR Part 141). Detention basins would capture all runoff, which would be monitored for contamination and treated, as necessary, before it was released to the environment. If the storage facility required active cooling systems, those systems would be designed to contain any inadvertent spill of operating fluids so they could not reach the environment. Therefore, No-Action Scenario 1 would be unlikely to produce adverse impacts to surface-water quality during routine operations.

During construction of the replacement storage facilities, adherence to stormwater pollution prevention plans would ensure that cleared areas and exposed earth would be seeded, graveled, or paved to control runoff and minimize soil erosion that could adversely affect surface-water quality. Surface-water runoff detention ponds would prevent eroded material from entering surface water systems. These erosion control practices would ensure minimal impacts to surface-water quality during construction. To prevent contamination from construction equipment, workers would monitor the equipment for leaks. Inadvertent spills of industrial fluids would be contained and cleaned up in accordance with established spill prevention and cleanup plans. Therefore, the No-Action Alternative would be unlikely to produce adverse impacts to surface-water quality during construction operations.

7.2.1.3.2 Groundwater

During routine operations, best management practices such as spill prevention and cleanup plans and procedures and effective monitoring procedures would ensure that inadvertent contaminant releases

would not reach groundwater. Therefore, the No-Action Alternative would be unlikely to produce adverse impacts to groundwater quality during routine operations.

The spent nuclear fuel storage facilities at the commercial sites would be surface structures with shallow foundations such that their construction would not disturb groundwater systems. Some DOE storage facilities would be subsurface structures for which construction might require minimal dewatering of the groundwater aquifer. However, the area occupied by the structure would be small in relation to the size of the aquifer, so no adverse impacts would be likely to result from dewatering activities.

Excavations would remove the soil buffer between surface activities and groundwater, increasing the likelihood of groundwater contamination from an inadvertent spill or leak of construction-related fluids (for example, diesel fuel, oil, hydraulic fluids). Construction activities would be as described above for surface water; thus, the penetration of spilled construction fluids to groundwater would be unlikely. Therefore, the No-Action Alternative would be unlikely to produce adverse impacts to groundwater quality during construction operations.

7.2.1.4 Biological Resources and Soils

Impacts to biological resources or soils from the construction and operation of spent nuclear fuel and high-level radioactive waste storage facilities would be minimal. Heat from the storage modules would not affect nearby vegetation. The storage facilities would be fenced to keep wildlife out. However, some smaller animal species could take advantage of the warm air from storage facility vents in winter, and individual animals could receive adverse impacts, including death, from direct exposure to radiation. As the heat of radioactive decay decreased, these sites would become less attractive to animals seeking warm environments.

The storage facilities would have a minimal effect on the soil. Because the operating and decommissioned facilities would alternate between two locations, the amount of soil disturbed by construction would be very small. By adhering to best management practices and standard operating procedures, DOE expects that spills would be minimal. A spill would be contained and cleaned up immediately, thus minimizing the area of soil affected.

7.2.1.5 Cultural Resources

Replacement spent nuclear fuel and high-level radioactive waste storage facilities would generally be on undeveloped land in rural areas owned by DOE or the commercial utilities. The size of each facility and supporting infrastructure would be small enough to avoid known cultural resources. If construction activities uncovered previously unknown archaeological sites, human remains, or funerary objects, DOE or the commercial utility would comply with Executive Orders and Federal and state regulations for the protection of cultural resources (see Chapter 11, Section 11.2.5, for details). Therefore, the No-Action Alternative would be unlikely to produce adverse impacts to cultural resources during construction and operations.

7.2.1.6 Socioeconomics

Storage facilities for spent nuclear fuel and high-level radioactive waste would be at existing DOE and commercial sites. A staff of about eight workers (two individuals on duty per shift, 24 hours per day) would monitor and maintain each facility (DIRS 104596-Orthen 1999, Table 2, p. 4). The analysis assumed that facilities would require replacement every 100 years, and that there would be a major facility repair halfway through the first 100-year cycle. Facility replacement every 100 years would require approximately 40 workers for 2 years (DIRS 104596-Orthen 1999, Table 2 and Table 6). Major

repairs halfway through the first 100-year cycle would require about 40 workers for 1 year (DIRS 104596-Orthen 1999, Table 2 and Table 6).

Each of the 77 sites that stores spent nuclear fuel or high-level radioactive waste employs monitoring and maintenance personnel. Additional staffing for facility replacement [and the one-time major repair (see DIRS 104596-Orthen 1999, Tables 1 and 2)] would be temporary and comprise about 40 employees at a site during construction. (Construction of DOE facilities could require more workers, but the Department would have only five of these facilities reconstructed every 100 years.) This temporary increase in employment would be small in proportion to the existing workforces in affected communities. Therefore, the No-Action Alternative would be unlikely to have adverse effects on socioeconomic factors such as infrastructure and regional economy.

7.2.1.7 Occupational and Public Health and Safety

7.2.1.7.1 Nonradiation Exposures

Maintenance, repairs, repackaging, and construction at the storage facilities would be conducted in accordance with requirements of the Occupational Health and Safety Administration and National Institute of Occupational Safety and Health. Administrative controls and design features would minimize worker exposures to industrial nonradioactive hazardous materials during the construction and operation of the storage facilities so exposures would remain below hazardous levels.

7.2.1.7.2 Industrial Hazards

The industrial hazards evaluated were (1) total recordable injury and illness cases, (2) lost workday cases associated with workplace injuries and illnesses, and (3) workplace fatalities. The estimates of these traumas were based primarily on the staffing level of involved workers assigned to spent nuclear fuel and high-level radioactive waste management tasks, coupled with representative workplace loss indicators maintained by the Bureau of Labor Statistics (DIRS 148091-BLS 1998, all) or the DOE Computerized Accident/Incident Reporting System database (DIRS 147938-DOE 1999, all). Involved worker risk exposure estimates were based on crew sizes to determine the number of full-time equivalent work years assigned to construction and to operations, surveillance, and maintenance tasks. DOE used representative historic total recordable case, lost workday case, and fatality incident data to project the associated trauma incidence based on the number of workers and their job functions.

This analysis assumed that replacement facilities would be constructed every 100 years and that a major repair and upgrade of the initial facilities would be required once after the first 50 years. Impacts from decommissioning retired facilities were included as part of construction.

For the approximately 100-year construction and operation cycle (2002 to 2116), about 72,000 full-time equivalent work years of effort would be required to maintain and repair about 6,600 concrete storage modules and 4 below-grade storage vaults at the 72 commercial and 5 DOE sites (DIRS 104596-Orthen 1999, Tables 1, 6, and 7). Based on this level of effort, as listed in Table 7-5, about 2,300 industrial safety incidents would be likely, resulting in about 1,000 lost workday cases and 2 fatalities (an average of 1 fatality every 50 years).

In addition, for the remaining 9,900 years, Table 7-5 indicates about 290,000 estimated industrial safety incidents, of which about 130,000 would be lost workday cases and 320 would involve fatalities (an average of 1 fatality every 30 years or about one every 2,500 years at each of the 77 sites). Surveillance tasks would consume 94 percent of the total worker level of effort, construction tasks would consume nearly all of the remaining 6 percent, and operations tasks would consume less than 0.001 percent (DIRS 104596-Orthen 1999, Table 2).

7.2.1.7.3 Radiation Exposures

For Scenario 1, the analysis assumed that the facilities would undergo major repairs once during the first 100 years and would be replaced every 100 years thereafter. Very low exposures to future construction workers would occur as they built replacement facilities adjacent to the existing facilities. Transferring the dry storage canisters from old to new concrete storage modules would result in some additional exposures to workers.

During normal operations, facility workers would be exposed to low levels of external radiation while performing routine surveillance and monitoring activities, changing high-efficiency particulate air filters on ventilation systems (for high-level radioactive waste storage facilities), transferring dry storage canisters between concrete storage modules, and maintaining and repairing the facilities. In addition, individuals employed at the nearby nuclear powerplant but not directly involved with activities at the spent nuclear fuel storage facility (noninvolved workers) would be exposed to low levels of external radiation emanating from the filled concrete storage modules. Activities within the facility boundaries would be in accordance with DOE or Nuclear Regulatory Commission guidelines for nuclear facility worker protection (10 CFR Part 835 and 10 CFR Part 20). Table 7-6 lists estimated maximum annual individual doses and the total average collective dose for worker populations during the 100- and 10,000-year analysis periods for commercial and DOE sites.

The Scenario 1 analysis treated the dose rates from DOE spent nuclear fuel as equivalent to commercial spent nuclear fuel on a volume basis. This simplifying assumption had minimal effect on estimated individual and population doses because of the relatively small quantities of DOE spent nuclear fuel (less than 10 percent of the total) and essentially equal radiation exposure rates in comparison to commercial spent nuclear fuel on a volume basis. The analysis separated the calculation of dose rates from high-level radioactive waste because of the difference in source materials.

For Scenario 1, dose rates from high-level radioactive waste were estimated based on the isotopic distributions provided in Appendix A, Tables A-28, A-29, and A-30. As with commercial and DOE spent nuclear fuel, estimated dose rates to facility workers considered shielding provided by the concrete facility structures and decay over the 10,000-year analysis period. However, because of the relatively large distance from the storage facilities to the site boundary [typically more than 3 kilometers (2 miles) at the Hanford Site, the Idaho National Engineering and Environmental Laboratory, and the Savannah River Site], doses to the public were not included. Although the distance to the site boundary at the West Valley Demonstration Project is less than 3 kilometers, not including public exposures from above-grade storage facilities would result in a very small underestimation of impacts because DOE stores only about 4 percent of the high-level radioactive waste at that facility.

Very small air quality impacts would be likely from repackaging materials removed from dry storage containers that could degrade to the point that they no longer met licensing requirements. However, overall impact estimates did not include these impacts because long-term dry storage canister degradation would be highly variable and difficult to estimate from site to site, and DOE did not want to overestimate the accompanying air quality impacts from repackaging.

Table 7-5. Estimated industrial safety impacts at commercial and DOE sites during the first 100 years and the remaining 9,900 years of the 10,000-year analysis period under Scenario 1.^a

Industrial safety impacts	Short-term ^b (100 years) construction and operation	Long-term (9,900 years) ^c construction and operation
Total recordable cases	2,300	290,000
Lost workday cases	1,000	130,000
Fatalities	2.4	320

a. Source: DIRS 104596-Orthen (1999, Tables 6 and 7).
 b. The estimated impacts would result from a single 100-year period of storage module construction (renovation), operation, surveillance, and repair.
 c. Period from 100 to 10,000 years.

Table 7-6. Estimated radiological impacts (dose) and consequences from construction and routine operation of commercial and DOE spent nuclear fuel and high-level radioactive waste storage facilities – Scenario 1.^a

Receptor	Short-term (100 years) construction and operation	Long-term (9,900 years) construction ^b and operation
<i>Population^c</i>		
MEI ^d (millirem per year)	0.20	0.06
Dose ^e (person-rem)	810	5,200
LCFs ^f	0.41	2.6
<i>Involved worker^g</i>		
MEI ^h (millirem per year)	170	50
Dose ^e (person-rem)	2,600	24,000
LCFs ^f	1.0	10
<i>Noninvolved workersⁱ</i>		
MEI ^j (millirem per year)	13	0 ^k
Dose ^e (person-rem)	36,000	0 ^k
LCFs ^f	15	0 ^k

- a. Source: Adapted from DIRS 101898-NRC (1991, all); DIRS 104596-Orthen (1999, all).
- b. Assumes construction of 6,600 concrete storage modules and three below-grade vaults at 77 sites every 100 years (DIRS 104596-Orthen 1999, Table 1).
- c. Members of the general public living within 3 kilometers (2 miles) of the facilities; estimated to be 140,000 over the first approximately 100 years and approximately 14 million over the duration of the analysis period [estimated using DIRS 102204-Humphreys, Rollstin, and Ridgely (1997, all)].
- d. MEI = maximally exposed individual; assumed to be approximately 1.4 kilometers (0.8 mile) from the center of the storage facility (DIRS 101898-NRC 1991, p. 22).
- e. Estimated doses account for radioactive decay.
- f. LCF = latent cancer fatality; expected number of cancer fatalities for populations. Based on a risk of 0.0004 and 0.0005 latent cancer fatality per rem for workers and members of the public, respectively (DIRS 101857-NCRP 1993, p. 112), and a life expectancy of 70 years for a member of the public and a 50-year career for workers.
- g. Involved workers would be those directly associated with construction and operation activities (DIRS 101898-NRC 1991, pp. 23 to 25). For this analysis, the involved worker population would be approximately 1,400 individuals (700 individuals at any one time) at 77 sites over 100 years (DIRS 104596-Orthen 1999, Table 6). This population would grow to about 160,000 over 10,000 years.
- h. Based on maximum construction dose rate of 0.11 millirem per hour and 1,500 hours per year (DIRS 101898-NRC 1991, p. 23).
- i. Noninvolved workers would be employed at the powerplant but would not be associated with facility construction or operation. For this analysis, the noninvolved worker population would be 80,000 individuals who would receive exposures until the powerplants were decommissioned (50 years).
- j. Based on a projected area workforce of 1,200 and an average estimated annual dose of 16 person-rem (DIRS 101898-NRC 1991, p. 24).
- k. During this period the powerplants would have ended operation, so there would be no noninvolved workers.

As listed in Table 7-6, the estimated dose to the hypothetical maximally exposed offsite individual during the short-term operational period between 2002 and 2116 would be about 0.20 millirem per year (DIRS 101898-NRC 1991, p. 22). For the remaining 9,900 years of the analysis period (long-term impacts), the dose to the hypothetical maximally exposed individual would decrease to about 0.060 millirem per year because of radioactive decay of the source material. During about the first 100 years, the dose (accounting for radioactive decay) could result over a 70-year lifetime of exposure in an increase of 0.0000043 in the lifetime risk of contracting a fatal cancer, an increase over the lifetime natural fatal cancer incidence rate of 0.0018 percent. During the remaining 9,900 years of the analysis period, the dose could result in an increase of 0.0000013 in the lifetime risk of contracting a fatal cancer, an increase of 0.00055 percent over the lifetime natural fatal cancer incidence rate.

Based on the Nuclear Regulatory Commission computer program SECPOP (DIRS 102204-Humphreys, Rollstin, and Ridgely 1997, all), in 1990 approximately 100,000 people lived within 3 kilometers (2 miles) of some type of commercial nuclear facility (DIRS 101917-Rollins 1998, p. 9). Over the 100-year

analysis period, the total number of people that would be exposed would be approximately 140,000 because more than one 70-year lifetime would be spanned during the 100-year period. As listed in Table 7-6, between 2002 and 2116 these people would be likely to receive a total collective dose of 810 person-rem.

Long-term doses and latent cancer fatalities for the approximately 9,900-year period between 2116 and 12010 were based on the assumptions described above, with a few notable exceptions. Impacts to noninvolved workers were not calculated because all of the nuclear powerplants would be closed by the beginning of this period. In addition, the total exposed populations of workers and the public would increase by a factor of 100 above the 100-year exposed population because this period would span 140 lifetimes of 70 years. As noted above, for the first 100 years of operation approximately 140,000 people living within 3 kilometers (2 miles) of the storage facilities (100,000 people multiplied by 1.4 consecutive 70-year average human lifetimes [the average number of 70-year lifetimes in 100 years]) would be exposed to external radiation. Over 10,000 years the exposed population would total approximately 14 million people. Therefore, for the period between 2116 and 12010, the offsite population would receive an estimated total collective dose of 5,200 person-rem (adjusted for radioactive decay).

Population statistics indicate that in 1990 cancer caused about 24 percent of the deaths in the United States (DIRS 153066-Murphy 2000, p. 5). If this percentage of deaths from cancer continued, about 24 people out of every 100 in the U.S. population would contract a fatal cancer from some cause. For approximately the first 100 years, the radiation exposure dose from the storage facilities could cause an additional 0.41 latent cancer fatality in the surrounding populations. This would be in addition to about 33,000 cancer fatalities that would be likely in the exposed population of 140,000 from all other causes, or an increase in the natural incidence rate of 0.0012 percent. For the remaining 9,900 years of the analysis, the radiation exposure dose from the storage facilities could result in an additional 2.6 latent cancer fatalities in the surrounding populations. This would be in addition to about 3.3 million cancer fatalities that would be likely to occur in the exposed population of 14 million, or an increase of 0.000079 percent over the natural incidence rate.

The analysis assumed the maximally exposed individual in the involved worker population would be involved in constructing and loading replacement facilities. Assuming a maximum dose rate of 0.11 millirem per hour and an average exposure time of 1,500 hours per year, this construction worker would receive about 170 millirem per year. During about the first 100 years, the dose could result (over 3 years of construction) in an increase in the lifetime risk of contracting a fatal cancer of 0.00020, an increase of 0.090 percent over the national fatal cancer incidence rate of about 24 percent. During the remaining 9,900 years of the analysis period, the dose could result (over 3 years of construction) in an increase in the risk of contracting a fatal cancer of 0.000060, an increase of 0.030 percent over the natural fatal cancer incidence rate.

For the involved worker population of 1,400 individuals, approximately 330 would be likely to contract a fatal cancer from some cause other than occupational exposure. In this population (during the first 100 years), the collective dose of 2,600 person-rem (correcting for decay) between 2002 and 2116 could result in about 1 additional latent cancer fatality (DIRS 104596-Orthen 1999, Table 6), an increase of 0.33 percent over the natural incidence rate of fatal cancers from all causes. During the remaining 9,900 years of the analysis period, the approximately 160,000 involved workers would receive a collective dose of 24,000 person-rem (corrected for decay). This dose could result in an additional 10 latent cancer fatalities (about 1 every 1,000 years during the 9,900-year analysis period), an increase of 0.027 percent over the natural incidence rate of fatal cancers.

Noninvolved workers would be those employed at an operating nuclear powerplant but not directly involved with the day-to-day operation of the spent nuclear fuel storage facility. The analysis assumed that noninvolved workers (about 800 for each of the approximately 100 reactor units at 72 commercial

sites) would be generally several hundred to several thousand feet from the storage facilities. In addition, it assumed that noninvolved workers would be at the sites until 2052 (that is, for 50 years).

The Nuclear Regulatory Commission estimated that the dose to noninvolved workers at a nuclear powerplant from a fully loaded independent spent fuel storage installation would be about 16 person-rem per year (DIRS 101898-NRC 1991, p. 24) for the protected-area workforce of 1,200 individuals (DIRS 101898-NRC 1991, p. 26) at the two-unit station of Calvert Cliffs. This collective dose would result in an average maximum dose to the noninvolved worker of 13 millirem per year. Over a 50-year career, this exposure (accounting for radioactive decay) could result in an increase in lifetime risk of contracting a fatal cancer of 0.00018, an increase of 0.077 percent over the natural incidence rate of fatal cancers.

The analysis made the conservative assumption that there are about 80,000 powerplant workers in the United States (800 per reactor unit and about 100 units currently operating), and that these workers would receive radiation exposure from the adjacent storage facilities until powerplant decommissioning, which the analysis assumed will occur in 2052. In the total noninvolved worker population of 80,000 powerplant workers (all sites), the collective dose of 36,000 person-rem (accounting for radioactive decay) between 2002 and 2116 could result in 15 additional latent cancer fatalities. This would be about 0.079 percent more than the 19,000 cancer fatalities that would be likely to occur from all other causes in the same worker population.

Figure 7-6 shows the calculated dose to these populations as a function of time, expressed as 70-year doses. For the noninvolved worker population, the population dose would occur during only the first 70-year interval. The public dose would decrease over time due to the inherent radioactive decay that will occur in the spent nuclear fuel and high-level radioactive waste as time elapses. Many of the radioactive constituents have half-lives substantially less than 10,000 years; therefore, it is likely that the dose to the public would decrease noticeably over time. The involved worker population dose also would decrease over time because of radioactive decay. The involved worker dose would fluctuate as new concrete storage modules were constructed and radioactive material was transferred from the old to the new modules every 100 years. During those 70-year intervals in which construction and transfer would occur, the dose would be higher; the dose would be lower during those 70-year intervals when these activities did not occur.

Because no liquid or airborne effluents would emanate from the storage facilities, direct and air-scattered radiation would comprise the total source of radiation exposure to the public. For populations more than 3 kilometers (2 miles) from the facilities (as is the case for most DOE facilities), direct and air-scattered external radiation exposure would be small (DIRS 101898-NRC 1991, p. 22).

7.2.1.8 Accidents

For Scenario 1, activities at each facility would include surveillance, inspection, maintenance, and equipment replacement, when required. The facilities and the associated systems, which the Nuclear Regulatory Commission would license, would have certain required features. License requirements would include isolation of the stored material from the environment and its protection from severe accident conditions. The Nuclear Regulatory Commission requires an extensive safety analysis that considers the impacts of plausible accident-initiating events such as earthquake, fire, high wind, and tornado. In addition, the license would specify that facility design requirements include features to provide protection from the impacts of severe natural events. These requirements and analyses must demonstrate that the facilities could withstand the most severe wind loading (tornado winds and tornado-generated missiles) and flooding from the Probable Maximum Hurricane with minimal release of radioactive material. This analysis assumed indefinite maintenance of these features for the storage facilities.

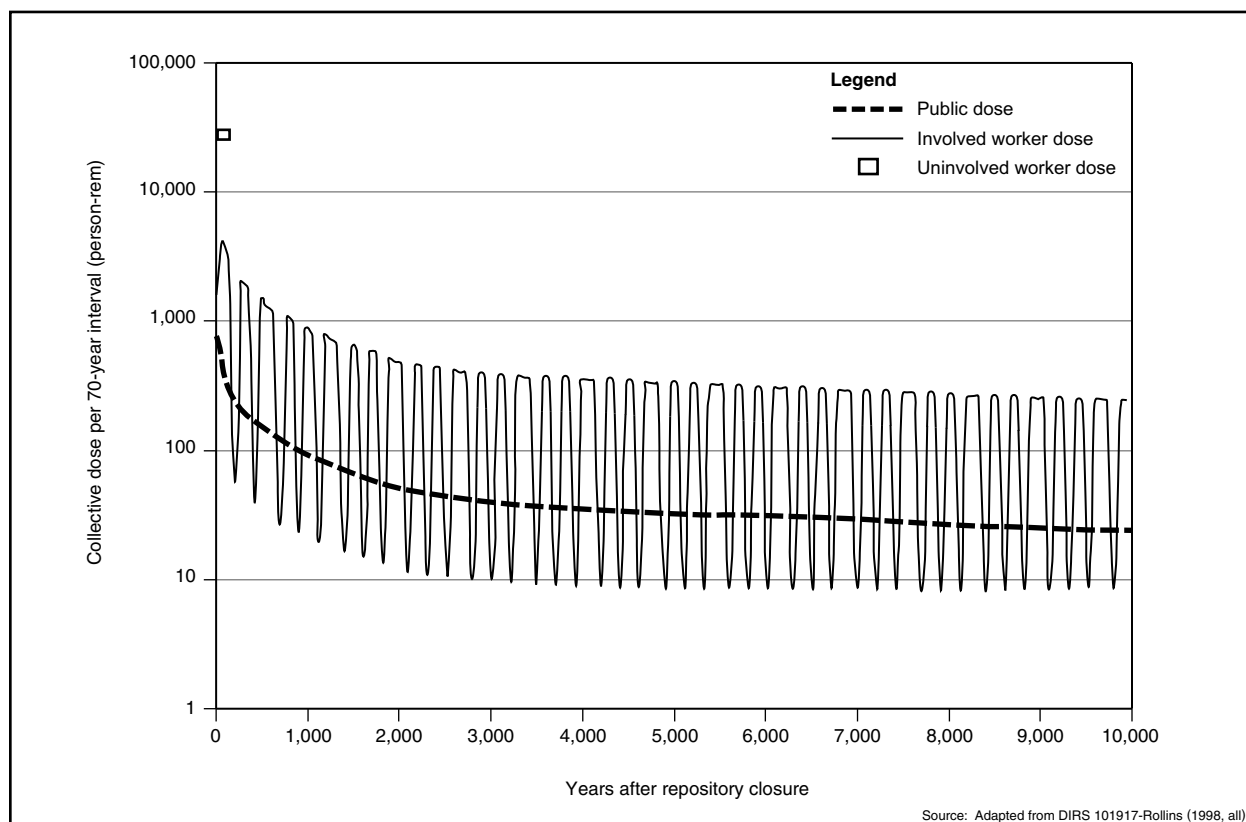


Figure 7-6. Collective dose for 70-year intervals for No-Action Scenario 1.

DOE performed an analysis to identify the kinds of events that could lead to releases of radioactive material to the environment prior to degradation of concrete storage modules and found none. The two events determined to be the most challenging to the integrity of the concrete storage modules would be the crash of an aircraft into the storage facility and a severe seismic event.

- DIRS 103711-Davis, Strenge, and Mishima (1998, all) evaluated the postulated aircraft crash and subsequent fire at a storage facility. The analysis showed that falling aircraft components produced by such an event would not penetrate the storage facility and that a subsequent fire would not result in a facility failure. This conclusion is consistent with representative analyses performed in support of Nuclear Regulatory Commission license applications for above-grade dry storage (DIRS 103449-PGE 1996, all; DIRS 103177-CP&L 1989, all).

DIRS 103711-Davis, Strenge, and Mishima (1998, all) evaluated aircraft crashes with a velocity of 550 kilometers per hour (340 miles per hour) based on the DOE aircraft crash standard (DIRS 101810-DOE 1996, p. C-7). In a scenario where aircraft velocities could be higher, there would be an increased potential that the intact storage facility could be subject to failure, resulting in a release of radiological materials. DOE has not performed a more detailed analysis of these licensed facilities because the Nuclear Regulatory Commission has a comprehensive program underway to evaluate such events at their licensed facilities, including commercial spent fuel storage facilities. The Commission would be expected to take whatever action is necessary to provide adequate protection to the public from such events.

- For the seismic event, major damage would be unlikely because storage facilities would be designed to withstand severe earthquakes. Even if such an event caused damage, immediate release of radioactive particulates would be unlikely because analyses have identified no mechanism that would

cause fuel pellet damage sufficient to create respirable airborne particles (DIRS 103449-PGE 1996, all; DIRS 103177-CP&L 1989, all). Therefore, the source term would be limited to gaseous fission products, carbon-14, and a very small amount of preexisting fuel-pellet dust. Subsequent repairs to damaged facilities or concrete storage modules would preclude the long-term release of radionuclides.

Criticality events are not plausible for Scenario 1 because water, which is required for criticality, could not enter the dry storage canister. The water would have to penetrate several independent barriers, all of which would be maintained and replaced as necessary under Scenario 1. Therefore, DOE determined that potential accident consequences would be bounded by a severe seismic event (see Appendix K, Section K.2.5). DOE analyzed this event and concluded that such an accident scenario would not result in radiological impacts to members of the public in the immediate vicinity of the storage facility. In addition, there would be limited quantities of nonradioactive hazardous or toxic substances stored at the facilities. Therefore, nonradiological accident impacts would be limited to those from industrial hazards and traffic, as discussed in Sections 7.2.1.7.2 and 7.2.1.14, respectively.

7.2.1.9 Noise

During routine operations, noise levels would not affect workers, the public near the facility, or the environment. Most of the storage facilities would have passive cooling, although a few could have active cooling with fans and blowers. Because the storage facilities would be away from population centers or homes, the noise of blowers, if used, would not affect the nearby public. The noise would not be loud enough to produce adverse impacts on the facility workers' hearing.

The analysis assumed for Scenario 1 that the storage facilities would require complete replacement every 100 years. During construction, noise levels due to construction traffic and activities would exceed ambient noise levels. To protect personnel, Occupational Safety and Health Administration standards would be followed (29 CFR 1910.95). The noise could cause wildlife to leave the immediate vicinity of the construction activities, but would not be loud enough to affect individual animals permanently. Adverse impacts to wildlife would be temporary.

7.2.1.10 Aesthetics

Impacts from the storage facilities to aesthetic or scenic resources would be low. There would be two adjacent locations at each site on land that would already be disturbed. Every 100 years, a new facility would be constructed on the idle site, and the storage containers transferred. The old facility would be demolished and the site would remain idle for the next 100 years. Adverse impacts could occur during construction and demolition activities, but these impacts would be short-term and temporary.

7.2.1.11 Utilities, Energy, and Materials

As mentioned above, spent nuclear fuel and high-level radioactive waste storage facilities would have passive cooling, although a few could have active cooling with fans and blowers. Electricity would be required for these cooling systems and to light the storage facilities, but DOE anticipates that the amount of electricity would be small in comparison to the amount available. Fuel and materials would be needed to maintain and repair the facilities and to construct and demolish facilities every 100 years, but DOE expects impacts to these resources to represent a small fraction of the resources available to each of the 77 sites. Therefore, the No-Action Alternative would not produce adverse impacts on these resources during operation and construction activities.

7.2.1.12 Waste Management

Construction of new facilities and demolition of old facilities every 100 years (and the one-time refurbishment of existing facilities after the first 50 years) would generate construction debris and sanitary and industrial solid waste. In addition, routine repairs and maintenance to the facilities and storage containers, routine radiological surveys, and overpacking of failed containers would generate sanitary and industrial solid and low-level radioactive wastes. Because there would not be a dedicated workforce at the storage facilities, only small amounts of sanitary wastes would be generated except during construction periods. The greatest amount of waste would be generated by the demolition of facilities at the 72 commercial and 5 DOE storage sites every 100 years. The demolition of facilities once every 100 years at all the sites would generate, on average, an estimated 770,000 cubic meters (1 million cubic yards) of nonhazardous demolition debris, recyclable steel, and potentially a small amount of low-level waste if a dry storage canister were to fail while in storage (DIRS 104596-Orthen 1999, Table 7). The debris and wastes would be disposed of at commercial or DOE disposal facilities across the Nation. The impacts to available capacity would be spread nationwide, thus minimizing impacts to any one disposal facility. The capacities of the disposal facilities would accommodate the wastes generated at the storage facilities.

7.2.1.13 Environmental Justice

Potential impacts of continued storage with institutional control would be minimal for all populations living near the storage facilities. Because adverse impacts would be unlikely for any population, effects on minority or low-income populations would be unlikely to be disproportionately high and adverse.

Storage facilities would require small areas and would be on lands already owned by commercial utilities or DOE. Therefore, continued storage at these sites would be unlikely to introduce environmental justice concerns. If the United States determines that it will use continued storage at existing sites for the long-term disposition of spent nuclear fuel and high-level radioactive waste, site-specific analyses of storage facilities would be required to determine if environmental justice issues could result. The Nuclear Regulatory Commission has established this approach (DIRS 101899-NRC 1996, p. 9-16).

7.2.1.14 Traffic and Transportation

DOE analyzed short-term impacts (traffic fatalities) that could result from commuting to and from storage facilities for a single 100-year cycle. The amount of travel was determined from estimates of personnel needed to construct the storage facilities, load and reload the canisters into the storage modules, and conduct routine surveillance and repairs (DIRS 104596-Orthen 1999, all). Because the workforce at each storage facility would be small, opportunities for carpooling would be limited. Therefore, the analysis assumed each worker would commute individually.

An estimated 700 workers (see Section 7.2.1.7.3) would commute to and from work approximately 18 million times during the first 100 years. The analysis assumed an average one-way commute of 19 kilometers (12 miles) based on personal travel reported in the Nationwide Personal Transportation Survey by the Oak Ridge National Laboratory (DIRS 102064-FHWA 1999, p. 9). The analysis also used national data to estimate fatalities [in 1994, 1 fatality per 100 million kilometers (about 62 million miles) traveled by automobile (DIRS 148081-BTS 1999, p. 4)] over a single 100-year period. Based on the expected workforce, estimated number of trips, estimated average distance, and fatality data, approximately 7 traffic fatalities would occur in the workforce at the 77 sites in 100 years (or an average of less than 1 fatality every 10 years) (DIRS 104596-Orthen 1999, Table 6).

In addition, the analysis estimated the long-term traffic fatalities for the remaining 9,900-year analysis period. Using the estimated number of full-time equivalent work years of 7.4 million, about 730 traffic

fatalities would be likely during the 9,900-year analysis period at the 77 sites (or, on average, less than 1 fatality every 10 years).

The analysis also estimated traffic fatalities and latent cancer fatalities from trucks transporting construction materials to and demolition debris from the 77 sites assuming an 80-kilometer (50-mile) roundtrip distance. For the 9,900-year period, during the construction of replacement facilities, construction vehicles would travel about 1.2 billion kilometers (750 million miles), resulting in approximately 17 prompt traffic fatalities, or less than 1 fatality every 600 years (DIRS 103455-Saricks and Tompkins 1999, Table 4, pp. 34 and 35) and about 0.1 latent fatality from vehicle exhaust emissions.

7.2.1.15 Sabotage

Above-ground storage of spent nuclear fuel and high-level radioactive waste for 10,000 years would entail a continued risk of intruder access at each of the 77 sites. Sabotage could result in a release of radionuclides to the environment around the facility. Under Scenario 1, the analysis assumed that safeguards and security measures currently in place would remain in effect during the 10,000-year analysis period, thereby reducing the risk of sabotage.

As Nuclear Regulatory Commission licensees, the individual sites would be required to comply with Commission regulations and maintain the highest level of security as determined by the Commission, and any results from the reexamination of existing physical security and safeguard systems following the terrorist attack of September 11, 2001.

Because it is not possible to predict whether sabotage events would occur, and if they did, the nature of such events, DOE examined various accident scenarios in this Final EIS, which provide an approximation of the consequences that could occur.

7.2.2 NO-ACTION SCENARIO 2

DOE and commercial utilities intend to maintain control of the nuclear storage facilities as long as necessary to ensure public health and safety. However, Scenario 2 assumes no effective institutional control of the storage facilities after approximately the first 100 years to provide a basis for evaluating an upper limit of potential adverse human health impacts to the public from the continued storage of spent nuclear fuel and high-level radioactive waste. After about 100 years, Scenario 2 assumes that there would be no effective institutional control and that the storage facilities would be abandoned. Therefore, there would be no health risks for workers during that period. For the long-term impacts after about 100 years and for as long as 10,000 years, the analysis assumed that the spent nuclear fuel and high-level radioactive waste storage facilities at 72 commercial and 5 DOE sites would begin to deteriorate and that radioactive materials would be released to the environment, contaminating the local atmosphere, soil, surface water, and groundwater. Appendix K provides details of facility degradation, radioactive material environmental transport, and human radiological exposure and dose models.

Because Scenario 2 assumes effective institutional control during the first 100 years of the 10,000-year analysis period, the short-term impacts of that first 100 years would be the same as the impacts described for Scenario 1 (see Section 7.2.1). Therefore, this discussion focuses on long-term impacts (after the first approximately 100 years). However, after about 100 years under Scenario 2, when there would no longer be effective institutional control, construction and operation activities would not occur at the storage sites; therefore, socioeconomic and cultural resources would be unlikely to receive adverse impacts. In addition, noise would not emanate from the facilities; utilities, energy, or materials would not be expended; waste would not be generated; and workers would not commute to the sites. Thus, after approximately the first 100 years, No-Action Alternative Scenario 2 would not adversely affect socioeconomic and cultural resources; scenic resources; noise; utilities, energy and materials; waste

management; or traffic and transportation. Aesthetic resources would not change until the facilities began to degrade, at which time the aesthetic value of the sites would change.

7.2.2.1 Land Use and Ownership

Without maintenance and periodic replacement, facilities, storage containers, and the spent nuclear fuel and high-level radioactive waste would begin to deteriorate. Eventually radioactive materials would contaminate the land surrounding the storage facilities, possibly rendering it unfit for human habitation or agricultural uses for hundreds or thousands of years. The amount of land contaminated would depend on several factors including the climate of the region, the amount of spent nuclear fuel and high-level radioactive waste at the site, and the rate of deterioration. Although the size of the affected area would be impossible to predict accurately for each site, DOE believes it would involve tens to hundreds of acres at each of the 77 sites.

By assuming that there would be no effective institutional control, this scenario also assumes that there would not be an orderly conversion of land use and ownership to other uses or ownership and that all knowledge of the purpose and content of the facilities would be lost. This would increase the likelihood that members of the public would move onto storage facility lands because they would not be aware of the potential radioactive material contamination.

7.2.2.2 Air Quality

As discussed in Appendix K, Section K.2.3, the degraded facilities would provide sufficient protection of the spent nuclear fuel and high-level radioactive waste materials to preclude the release of particulate radioactive materials in sufficient quantities to affect air quality adversely. Small releases of gaseous carbon-14 would be likely in the form of carbon dioxide gas but would not adversely affect ambient air quality.

7.2.2.3 Hydrology

7.2.2.3.1 Surface Water

As the concrete storage facilities, storage canisters, and spent nuclear fuel and high-level radioactive waste materials deteriorated, contaminants would enter surface waters from stormwater runoff from the failed facilities and storage containers and exposed radioactive materials. The introduction of contaminants would continue over a long period until the depletion of the source materials. During this release period, contaminant releases to surface waters could be sufficient to produce adverse impacts to human health. Section 7.2.2.5.3 discusses impacts to the public using this water for drinking.

7.2.2.3.2 Groundwater

As the concrete storage facilities, storage canisters, and spent nuclear fuel and high-level radioactive waste materials deteriorated, contaminants would enter the groundwater. Once contaminated, aquifers beneath the degraded storage facilities would remain contaminated for the period required for the depletion of the spent nuclear fuel and high-level radioactive waste materials and the migration of the contaminants from the groundwater system. Contaminant concentrations in the groundwater could be sufficient to produce adverse impacts to human health. Section 7.2.2.5.3 discusses impacts to the public using groundwater for drinking, bathing, and irrigation.

7.2.2.4 Biological Resources and Soils

As the concrete storage facilities, storage canisters, and spent nuclear fuel and high-level radioactive waste materials deteriorated, the potential for individual animals to be exposed to radiation at the storage sites would increase. In addition, animals could drink contaminated surface water. Direct radiation from the exposed spent nuclear fuel and high-level radioactive waste storage canisters and concentrations of contaminants in surface waters could produce adverse impacts to animals. While the contaminant exposure could have negative effects, including death, on individual animals, adverse effects to entire populations would be unlikely because the lethal area surrounding the degraded facilities would be limited to a few hundred acres.

Soils at the storage facilities could be contaminated by radioactive materials leaching from the spent nuclear fuel and high-level radioactive waste material. Soils downslope of the facilities could be contaminated by surface-water runoff. Crops grown on these soils would take up some of the contamination, thus making the contaminated soils a pathway for human exposure. Section 7.2.2.5.3 discusses impacts to members of the public from ingesting food grown in or livestock fed from contaminated soils.

7.2.2.5 Occupational and Public Health and Safety

7.2.2.5.1 Nonradiation Exposures

Analyses performed for the repository (see Chapter 5, Section 5.6) indicate that concentrations of chemically toxic materials (that is, molybdenum, nickel, vanadium, and chromium) from degraded spent nuclear fuel and high-level radioactive waste packages in the groundwater would be extremely low. Therefore, because of the relatively lower abundance of these materials contained in the stainless steel storage canisters and relatively greater abundance of water and the greater precipitation at the storage locations than at the repository, concentrations of the materials in the groundwater and surface water at the storage sites would likely be much lower than those estimated for the repository. The Department did not attempt to quantify adverse health impacts from chemical toxicity of the waste forms (principally uranium dioxide and *borosilicate glass*) that could occur within the exposed population under Scenario 2. This decision is consistent with the Department's position that care should be taken not to overestimate impacts from the No-Action Alternative.

7.2.2.5.2 Industrial Hazards

For about the first 100 years, industrial hazards would be the same as for the first 100 years under Scenario 1 (see Section 7.2.1.7.2). After about 100 years, Scenario 2 assumes there would be no effective institutional control and that the storage facilities would be abandoned and, therefore, there would be no industrial safety impacts.

7.2.2.5.3 Radiation Exposures

To simplify the analysis, DOE divided the United States into five regions (Figure 7-7). Regional radiological impacts were estimated by assuming all spent nuclear fuel and high-level radioactive waste in a particular region was stored at a single hypothetical site in that region. Appendix K, Section K.2.1.6, provides details of the methods and assumptions used in the regional analysis.

Radiological impacts to occupational workers and the offsite public from initial construction, routine maintenance and operations, and refurbishment after the first 50 years would be the same as those for the same period under Scenario 1 (see Section 7.2.1.7.3 and Table 7-6).

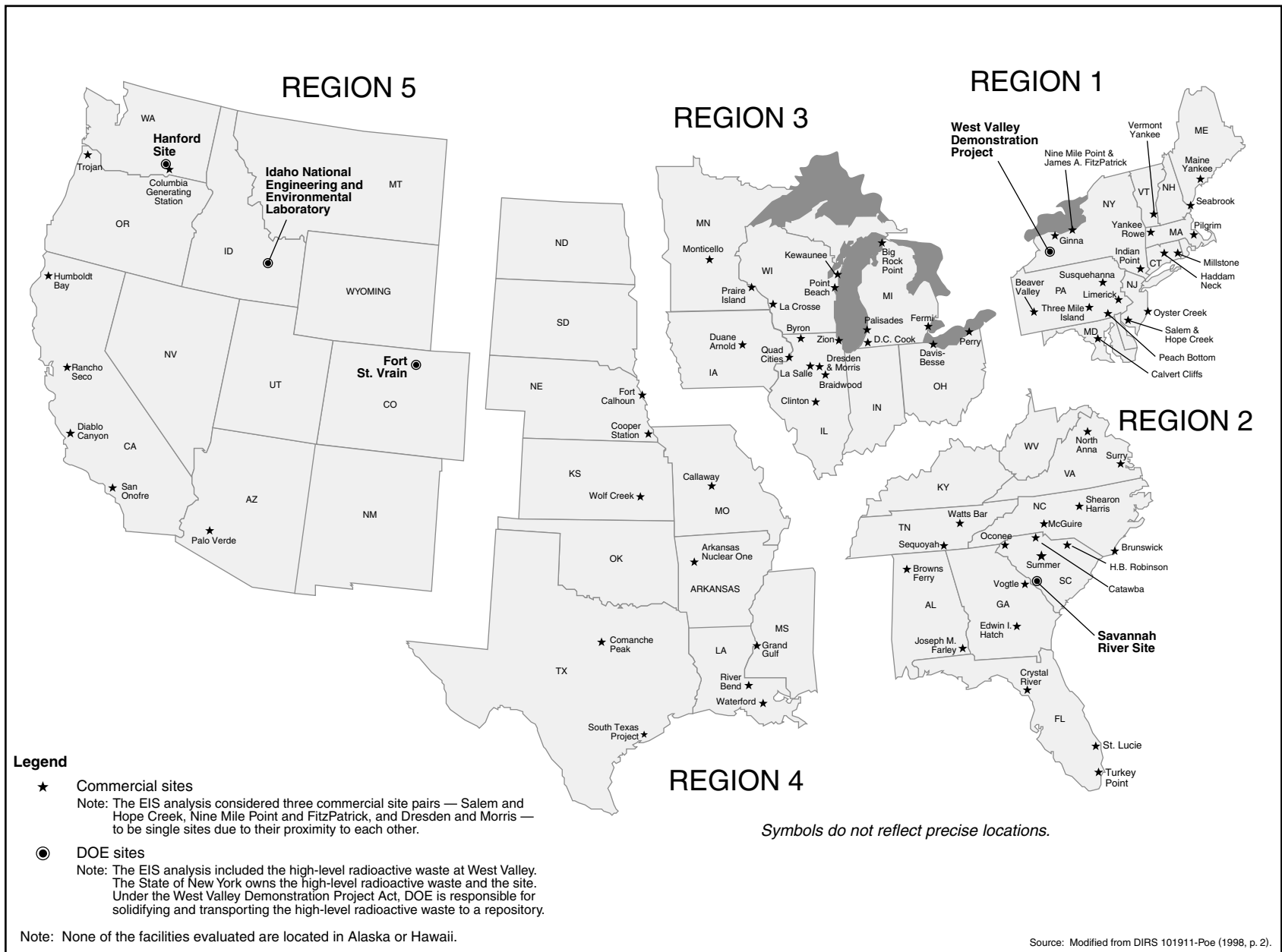


Figure 7-7. Commercial and DOE sites in each No-Action Alternative analysis region.

For Scenario 2 DOE assumed that after approximately the first 100 years there would be no institutional control and that deterioration of the facilities would occur over time. Based on regional climate and degradation models (see Appendix K), the spent nuclear fuel and high-level radioactive waste storage facilities and dry storage containers would corrode and fail over time, exposing radioactive material to the environment (wind and rain). Once exposed to the environment, the spent nuclear fuel and high-level radioactive waste storage packages and facilities would begin releasing small quantities of radioactive material to the atmosphere (gaseous carbon-14), soil, surface water, and groundwater, resulting in exposures to the public. These released materials could produce chronic exposures to the public, which could result in adverse health impacts. Figure 7-8 shows the conceptual timeline for activities and degradation processes at the storage facilities for Scenario 2.

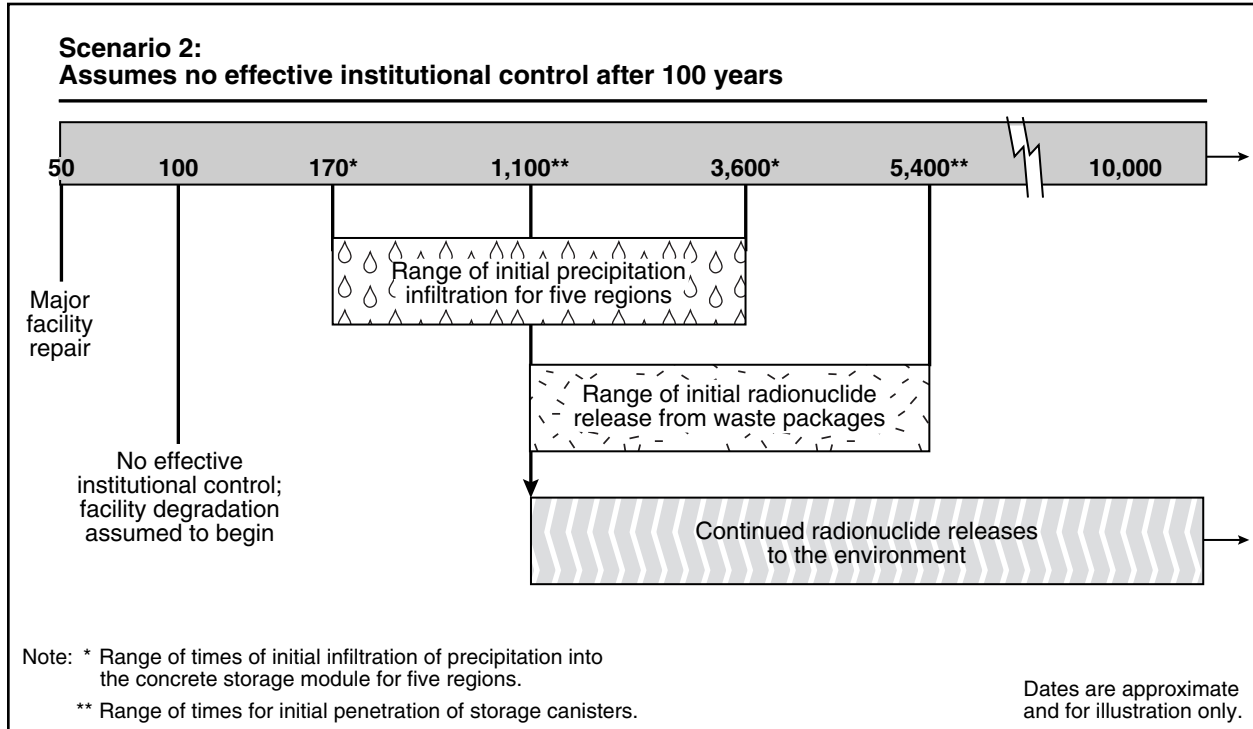


Figure 7-8. Conceptual timeline for activities and degradation processes for No-Action Scenario 2.

Appendix K describes the methods used to estimate impacts to human health from long-term environmental releases and human intrusion. The radiological impacts on human health include internal exposure from intake of radioactive materials in surface water and groundwater.

Table 7-7 lists the estimated radiological drinking water impacts during the 9,900 years under Scenario 2 with the assumption of no effective institutional control. The impacts listed in Table 7-7 are from drinking water only and would result from consuming water from the major waterways contaminated with radioactive materials by groundwater discharge and surface-water runoff from degraded spent nuclear fuel and high-level radioactive waste storage facilities. DOE evaluated

Table 7-7. Estimated long-term collective drinking water radiological impacts to the public from long-term storage of spent nuclear fuel and high-level radioactive waste at commercial and DOE sites – Scenario 2.

	9,900-year population dose ^a (person-rem)	9,900-year LCFs ^b	Years to peak impact ^c
	6,600,000	3,300	3,400
a.	Estimated total population (collective) dose from drinking water pathway (DIRS 101935-Toblin 1999, p. 4).		
b.	LCFs = latent cancer fatalities; estimated for the exposed population group based on an assumed risk of 0.0005 latent cancer fatality per person-rem of collective dose (DIRS 101857-NCRP 1993, p. 112).		
c.	Years after period of institutional control when the maximum doses would occur.		

other potential impacts to populations (for example, exposure to people living on the contaminated floodplains) and to individuals (for example, consumption of contaminated food) and determined that certain individuals could receive doses as much as three times higher than for drinking water alone but that doses to populations from contaminated floodplains would represent less than 10 percent of the impacts listed in Table 7-7. DOE did not include these impacts in Table 7-7 because the dose to an individual would depend largely on highly variable subsistence habits and because DOE did not want to overestimate the impacts from Scenario 2.

Figure 7-9 shows the locations of the commercial and DOE sites in the United States and the more than 20 major waterways potentially affected. At present, municipal water systems that serve 31 million people have intakes along the potentially affected portions of these waterways. The analysis assumed these populations would remain constant over the entire analysis period (9,900 years). Over the 9,900-year analysis period, about 140 70-year lifetime periods would be affected. Because the analysis estimated that releases would not occur during the first 1,000 years for most regions, the estimated potentially exposed population would be about 3.9 billion.

Table 7-7 indicates that over 9,900 years, a collective drinking water dose of 6.6 million person-rem could result in an additional 3,300 latent cancer fatalities in the total potentially exposed population of 3.9 billion. This latent cancer fatality rate would affect an average of about 24 people per 70-year lifetime, or about 1 latent cancer fatality at each of the 77 sites every 200 years. These radiation-induced latent cancer fatalities would be in addition to about 900 million fatal cancers (using the lifetime fatal cancer risk of 24 percent [DIRS 153066-Murphy 2000, p. 5]) that would be likely from all other causes in the exposed population, an incremental increase over the natural incidence of fatal cancer of about 0.0004 percent.

Figure 7-10 shows the estimated latent cancer fatalities for approximately 140 70-year periods during the 9,900-year period of analysis. The five peaks shown in Figure 7-10 generally result from contributions of each of the five regions (see Appendix K, Figure K-8). The major peak, which would occur about 3,400 years after effective institutional control ended (in 2100), would be due to radionuclide releases at the sites that drain to the Mississippi River and the relatively large populations along the Mississippi and its tributaries.

In addition to the 3,300 potential cancer fatalities under Scenario 2, more than 20 major waterways of the United States that currently supply domestic water to about 31 million people (for example, the Great Lakes; the Mississippi, Ohio, and Columbia Rivers; and many smaller rivers along the Eastern Seaboard) could be contaminated with radioactive material. Under this scenario, the shorelines could be contaminated with long-lived radioactive materials (for example, plutonium, uranium, and americium), resulting in exposures to individuals who came in contact with the sediments and, potentially, an increase in latent cancer fatalities. Because individuals would not be in constant contact with the sediments, these impacts represent a small fraction of the impacts estimated for the drinking water pathways listed in Table 7-7.

For purposes of comparison with impacts associated with the Proposed Action, DOE evaluated potential radiological impacts for a maximally exposed individual by constructing hypothetical exposure scenarios for individuals living near the degraded facilities. The exposure scenarios maximized external and internal exposure over each 70-year lifetime period in the 9,900-year period of analysis. The following paragraphs describe the results of these evaluations.

For Scenario 2, localized impacts to individuals from degraded facilities at the 77 sites could be severe. DOE estimated that within a few hundred years at the several sites where early concrete failure was predicted, hypothetical individuals living close to the storage facilities would receive lethal doses of

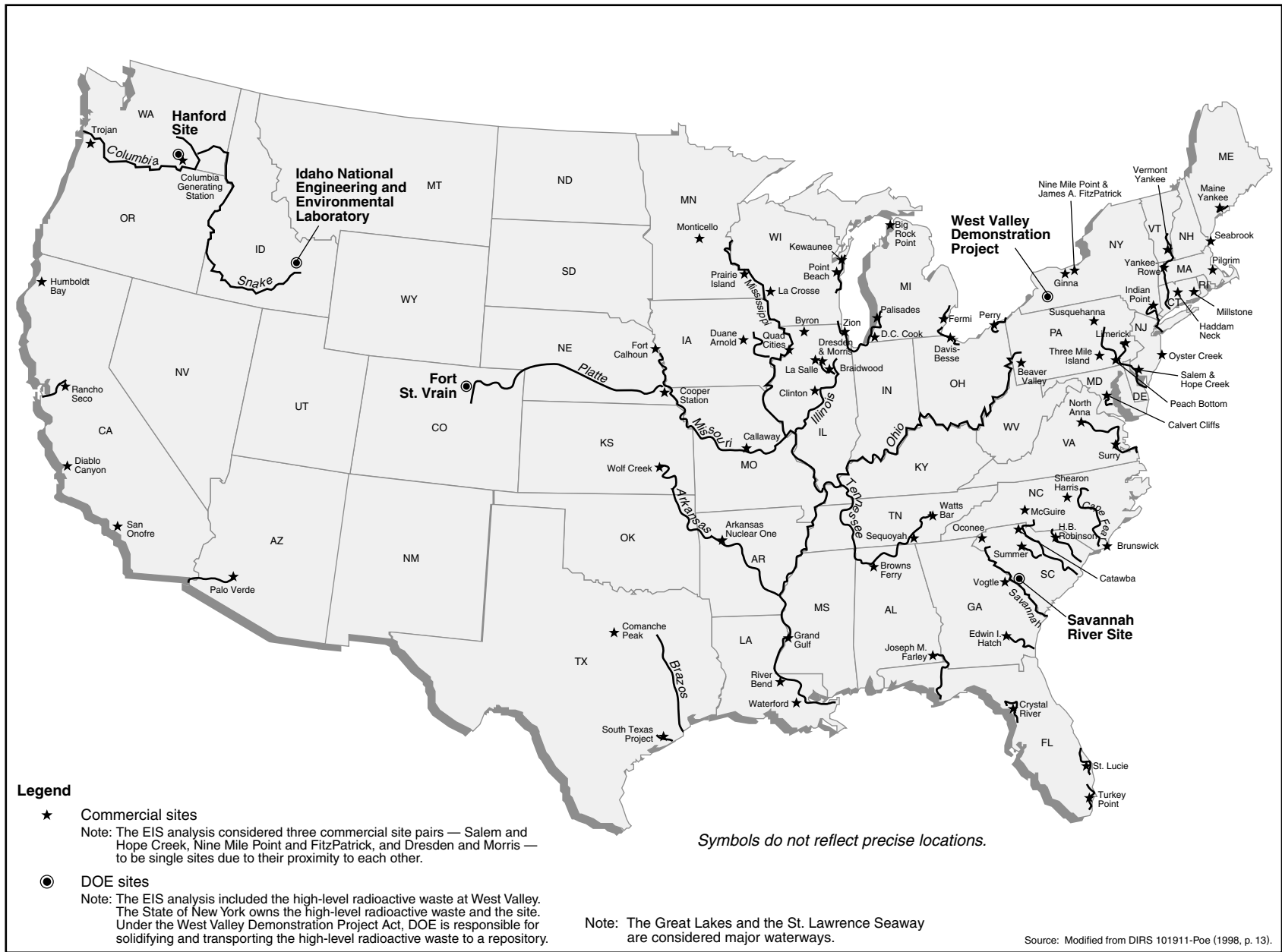


Figure 7-9. Major waterways near commercial and DOE sites.

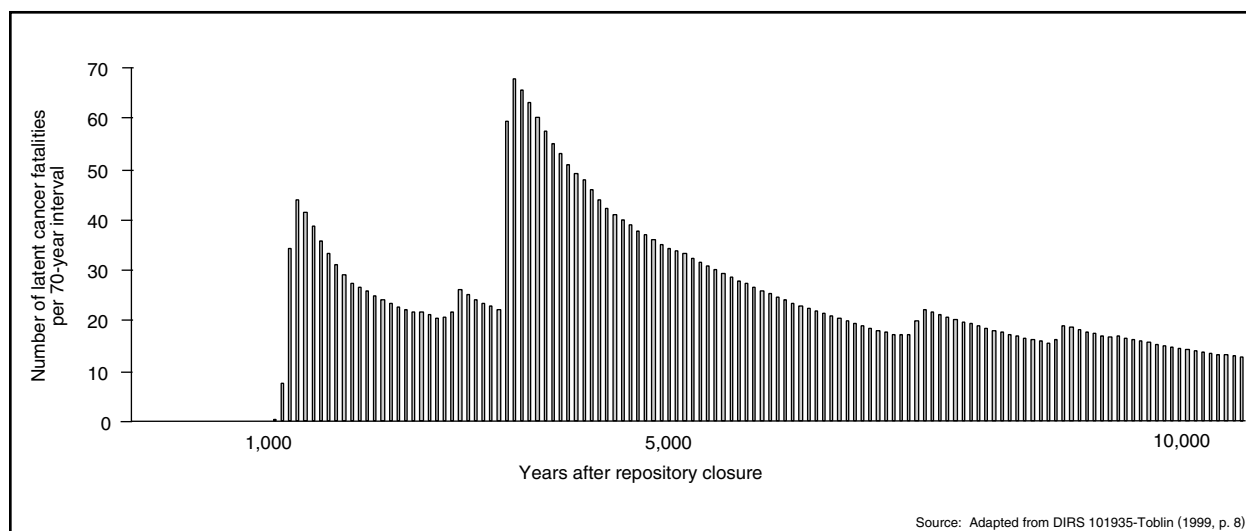


Figure 7-10. Potential latent cancer fatalities throughout the United States from No-Action Scenario 2.

external radiation [800 millirem per hour at a distance of 10 meters (33 feet)] from the exposed dry storage containers (see Appendix K, Section K.2.4.2).

To evaluate impacts from ingestion of radioactive materials, the analysis assumed that individuals would live near the degraded storage facilities and would consume contaminated groundwater and food from gardens irrigated with groundwater withdrawn from the contaminated aquifer directly below their locations. DOE estimated that within 6,000 years from now a hypothetical individual living within several hundred meters of a degraded facility could receive an internal committed effective dose equivalent to several thousand rem per year from ingestion of plutonium-239 and -240 (see Appendix F for further information on committed dose equivalent). Using the National Council on Radiation Protection and Measurements risk factors (DIRS 101857-NCRP 1993, p. 112), ingestion of plutonium at this rate could increase the individual's lifetime risk of contracting a fatal cancer after only a few years of exposure.

In addition, DOE estimated impacts for a hypothetical individual living 5 kilometers (3 miles) from the degraded facility on the downgradient of the contaminated aquifer. Although this individual would be too distant from the facility to receive any appreciable external radiation dose, the internal dose from the consumption of contaminated groundwater and contaminated crops could still be as high as 30 rem per year from ingestion of plutonium-239 and -240. Ingestion of plutonium at this rate could increase the individual's risk of contracting a fatal cancer after several decades of exposure. Appendix K provides details on the methods DOE used to evaluate localized impacts.

Uncertainty

This section contains estimates of the radiological impacts of No-Action Scenario 2, which assumes continued above-ground storage of spent nuclear fuel and high-level radioactive waste at sites across the United States. Associated with the impact estimates are uncertainties typical of predictions of the outcome of complex physical and biological phenomena and of the future state of society and societal institutions over long periods. DOE recognized this fact from the start of the analysis; however, the predictions will be valuable in the decisionmaking process because they provide insight based on the best information and scientific judgments available.

This analysis considered five aspects of uncertainty:

- Uncertainties about the nature of changes in society and its institutions and values, in the physical environment, and of technology as technology progresses

- Uncertainties associated with future human activities and lifestyles
- Uncertainties associated with the mathematical representation of the physical processes and with the data in the computer models
- Uncertainties associated with the mathematical representation of the biological processes involving the uptake and metabolism of radionuclides and the data in the computer models
- Uncertainties associated with accident scenario analysis

For the No-Action Scenario 2 analysis DOE has not attempted to quantify the variability of estimated impacts related to possible changes in climate, societal values, technology, or future lifestyles. To simplify the analysis, DOE did not attempt to quantify these uncertainties even though uncertainties with these changes could undoubtedly affect the total consequences reported in Table 7-7 by several orders of magnitude.

DOE attempted to quantify a range of uncertainties associated with mathematical models and input data, and estimated the effect these uncertainties could have on collective human health impacts. By summing the uncertainties (see Appendix K, Sections K.4.1, K.4.2, and K.4.3 for details), DOE estimated that total collective impacts over 10,000 years could have been underestimated by as much as 3 or 4 orders of magnitude. However, because there are large uncertainties in the models used to quantify the relationship between low doses (less than 10 rem) and the accompanying health impacts (see Appendix F, Section F.1.1.5), especially under conditions in which the majority of the population would be exposed at a very low dose rate, DOE believes the actual collective impact could be small.

On the other hand, impacts to individuals (human intruders) who could move to the storage sites and live close to the degraded facilities could be severe. During the early period (200 to 400 years after the assumed loss of institutional control), acute exposures to external radiation from the spent nuclear fuel and high-level radioactive waste material could result in prompt fatalities. In addition, after a few thousand years onsite shallow aquifers could be contaminated to such a degree that consumption of water from those aquifers could result in severe adverse health effects, including premature death. Uncertainties about these localized impacts are related primarily to the inability to predict accurately how many individuals could be affected at each of the 77 sites over the 10,000-year analysis period. In addition, the uncertainties associated with localized impacts would exist for potential consequences resulting from unusual events, both manmade and natural.

Therefore, uncertainties resulting from surface storage where containers are more readily affected by natural phenomena and human behavior (see Appendix K, Table K-14) that cannot be predicted, process model uncertainties, and dose-effect relationships, taken together, could produce the results listed in Table 7-7, overestimating or underestimating the actual impacts by as much as several orders of magnitude.

7.2.2.6 Atmospheric Radiological Consequences

As discussed in Appendix K, Section K.2.3, the analysis assumed that the configuration of the degraded storage facilities would cause debris to cover the radioactive material, which would remain inside the dry storage canisters. While the dry storage canisters could fail sufficiently to permit water to enter, they would probably retain their structural characteristics, thereby minimizing the dispersion of particulate radioactive material to the atmosphere (DIRS 147905-Mishima 1998, all). However, the radionuclides carbon-14 and iodine-129 would have a potential for gas transport. Although iodine-129 can exist in a gas phase, DOE expects it would dissolve in the precipitation and migrate in surface water and groundwater. DOE also expects the consequences from a release of carbon-14 to be very small based on

the low failure rate of zirconium-clad spent nuclear fuel (see Appendix K, Section K.2.1.4.1 for details) and large atmospheric dilution.

7.2.2.7 Accidents

For Scenario 2, the analysis examined the impacts of an accident scenario that could occur during the above-ground storage of spent nuclear fuel and high-level radioactive waste and concluded that the most severe accident scenarios would be an airplane crash into a concrete storage module. The frequency of such an event was estimated to be 0.0000032 (3 in 1 million) crashes per year.

In Scenario 2, the concrete storage modules would deteriorate with time. DOE concluded that an airplane crash into a degraded concrete storage module would dominate the consequences from external initiating events (see Appendix K, Section K.3.2.1). The analysis evaluated the potential for criticality accidents and concluded that an event severe enough to produce large consequences would be extremely unlikely, and that the consequences would be bounded by the airplane crash consequences. Table 7-8 lists the consequences of an airplane crash on a degraded concrete storage module.

Table 7-8. Estimated consequences of an aircraft crash on a degraded spent nuclear fuel concrete storage module.^a

Factor	High population site ^b	Low population site ^c
Frequency (per year)	3.2×10^{-6}	3.2×10^{-6}
Collective population dose (person-rem)	26,000	6,100
Latent cancer fatalities	13	3

a. Source: DIRS 103711-Davis, Strenge, and Mishima (1998, p. 11).
 b. Within 80 kilometers (50 miles) of site, an average of 330 persons per square mile.
 c. Within 80 kilometers of site, an average of 77 persons per square mile.

7.2.2.8 Environmental Justice

Deteriorating facilities, storage containers and packaging, and spent nuclear fuel and high-level radioactive waste could produce adverse effects to the nearby public. Any nearby minority or low-income communities could experience disproportionately high and adverse human health impacts. In addition, financial considerations could make it more difficult for members of any affected minority or low-income populations to obtain uncontaminated resources or to move away from contaminated soils and water. Because subsistence patterns for low-income and minority populations could vary from those of persons not in these groups, any affected low-income and minority populations could be exposed to greater than average doses. The result of differing potentials for exposure could be disproportionately high and adverse impacts to minority or low-income populations.

If the United States determines that it will use continued storage at existing sites for the long-term disposition of spent nuclear fuel and high-level radioactive waste, site-specific analyses of storage facilities would be required to identify if environmental justice issues could result. The Nuclear Regulatory Commission established this approach (DIRS 101899-NRC 1996, p. 9-16). With the assumption of no effective institutional control after about 100 years, potential environmental justice issues identified under Scenario 2 probably would be more severe than those identified under Scenario 1 (see Section 7.2.1.13).

7.2.2.9 Sabotage

For Scenario 2, the storage of spent nuclear fuel and high-level radioactive waste for 10,000 years without institutional control would entail a greater risk of intruder access at the 77 sites than exists under current conditions. Due to the lack of institutional control and degraded facilities, sabotage could result in a release of radionuclides to the environment around the facility. The analysis assumed that safeguards and security measures would not be maintained after approximately the first 100 years. For the remaining

9,900 years of the analysis period, the cumulative risk of intruder attempts would increase. As the *storage containers* degraded, they would become more vulnerable to failure. Any amount of material released from its storage container could contaminate areas with radioactivity. Therefore, the risks of sabotage would increase substantially under this scenario in comparison to Scenario 1.

7.3 Cumulative Impacts for the No-Action Alternative

DOE evaluated the disposal of 70,000 MTHM of spent nuclear fuel and high-level radioactive waste in the Proposed Action analysis. To provide a direct comparison of impacts with the Proposed Action, the No-Action analysis in Sections 7.1 and 7.2 evaluated the impacts of the continued storage of 70,000 MTHM of spent nuclear fuel and high-level radioactive waste at 72 commercial and 5 DOE sites across the United States. DOE chose the volume of 70,000 MTHM for analysis because the NWA prohibits the Nuclear Regulatory Commission from approving the emplacement of more than 70,000 MTHM in a first repository until a second repository is in operation. This section describes the results of the analysis of the cumulative impacts of the continued storage at the 77 existing sites of all spent nuclear fuel and high-level radioactive waste (called Inventory Module 1) (Table 7-9). Chapter 8 discusses the cumulative impacts of disposing of radioactive waste at the Yucca Mountain Repository in excess of the Proposed Action repository.

Table 7-9. Inventories for Proposed Action and Module 1.^a

Material	Proposed Action	Module 1
DOE spent nuclear fuel	2,333 MTHM	2,500 MTHM
Commercial spent nuclear fuel ^b	63,000 MTHM	105,000 MTHM
High-level radioactive waste ^b	8,315 canisters	22,280 canisters

a. Source: Appendix A, Section A.1.1.4.1.

b. Surplus plutonium would be included in the inventory in the form of mixed-oxide fuel (treated as commercial spent nuclear fuel) or immobilized plutonium (high-level radioactive waste).

A cumulative impact is defined as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions” (40 CFR 1508.7). Cumulative impact assessment is based on both the geographic (spatial) and time (temporal) considerations of past, present, and reasonably foreseeable actions. Geographic boundaries can vary by discipline depending on the time an effect remains in the environment, the extent to which the effect can migrate, and the magnitude of the potential impact. The proximity of other actions to the spent nuclear fuel storage sites is not the only decisive factor for determining the inclusion of an action in the assessment of cumulative impacts. Another, and for this analysis more important, factor is if the other actions would have some influence on the resources in the same time and space affected by continued storage.

The cumulative impacts of past actions have either passed through the environment or are part of existing baseline conditions. For example, the construction impacts of spent nuclear fuel storage facilities will have passed through the environment before the potential impacts associated with continued storage and refurbishment would first be seen in 2002.

DOE based its estimates of the potential impacts from continued storage of commercial spent nuclear fuel on a representative site. The results of the analysis described in the previous section are consistent with the Nuclear Regulatory Commission’s findings in its *Generic Environmental Impact Statement for License Renewal of Nuclear Plants* (DIRS 101899-NRC 1996, pp. 6-85 and 6-86). The NRC stated:

The Commission’s regulatory requirements and the experience with on-site storage of spent fuel in fuel pools and dry storage has been reviewed. Within the context of a license renewal review and

determination, the Commission finds that there is ample basis to conclude that continued storage of existing spent fuel and storage of spent fuel generated during the license renewal period can be accomplished safely and without significant environmental impacts. Radiological impacts will be well within regulatory limits; thus radiological impacts of on-site storage meet the standard for a conclusion of small impact. The nonradiological environmental impacts have been shown to be not significant; thus they are classified as small. The overall conclusion for on-site storage of spent fuel during the term of a renewed license is that the environmental impacts will be small for each plant. The need for the consideration of mitigation alternatives within the context of renewal of a power reactor license has been considered, and the Commission concludes that its regulatory requirements already in place provide adequate mitigation incentives for on-site storage of spent fuel.

Although this finding is applicable only to the continued storage of existing spent nuclear fuel and spent nuclear fuel generated during the 20-year license renewal period for the nuclear powerplant, DOE has concluded that potential environmental and radiological impacts for the storage facility would remain small for much longer periods. Environmental impacts would remain small because no additional fuel would be generated beyond the operation of the nuclear powerplant (plants are assumed to be closed after the first 20-year license renewal period), and radiological impacts would remain within regulatory limits specified in the storage facility license (10 CFR Part 72).

In general, the analysis of cumulative effects can exclude future actions if:

- The action is outside the geographic boundaries or timeframe established for the cumulative effects analysis.
- The action will not affect resources that are the subject of the cumulative effects analysis.
- Including the action would be arbitrary.

Because the estimated impacts would be small, DOE has not attempted to speculate on other arbitrary generic actions that could influence the cumulative impacts generated at a given site. However, the total incremental impact nationally of selected parameters is presented in the preceding section. In addition, the potential impacts at each site do not overlap because the storage sites are located throughout the United States. Therefore, cumulative impacts among the sites on resources would be unlikely.

For the 5 DOE sites, there is a long legacy of EISs and annual monitoring reports. The incremental impacts associated with continued storage of spent nuclear fuel can be added to the results reported in these documents to obtain an estimate of total impacts. For the 72 diverse commercial sites, information on other present and reasonably foreseeable actions varies in terms of data availability and quality. As a consequence, a comparison of cumulative assessments would be problematic, even if the impacts were not as small as the analyses indicate.

The cumulative analysis in this section includes the total projected inventory of commercial spent nuclear fuel, DOE spent nuclear fuel, and high-level radioactive waste (referred to as Module 1) that could come to the repository. Table 7-9 lists the inventories for the Proposed Action analysis and the Module 1 cumulative analysis.

For consistency with the cumulative impact analysis in Chapter 8, the No-Action analysis considered the same spectrum of environmental impacts as the Proposed Action. However, because of the DOE commitment to manage spent nuclear fuel and high-level radioactive waste safely, the Department decided to focus the No-Action cumulative analysis on the short- and long-term health and safety of workers and members of the public. Therefore, quantitative estimates of the cumulative impacts in this section include occupational and public health and safety, waste management, and traffic and transportation. The qualitative discussions of other disciplines are included for completeness.

DOE recognizes that approximately 2,100 cubic meters (74,000 cubic feet) of commercial low-level radioactive waste will exceed Nuclear Regulatory Commission Class C limits (listed in 10 CFR 61.55, Tables 1 and 2 for long and short half-life radionuclides, respectively). This type of waste, called *Greater-Than-Class-C low-level waste*, is generally not suitable for near-surface disposal (see Appendix A, Section A.2.5, for a detailed description). Similarly, DOE low-level radioactive waste that exceeds the Nuclear Regulatory Commission Class C limits (referred to as *Special-Performance-Assessment-Required waste*) will amount to about 4,000 cubic meters (142,000 cubic feet) (see Appendix A, Section A.2.6, for a detailed description). Together these waste types, added to the Module 1 inventory, comprise the Module 2 inventory.

The NWPA does not specifically consider Greater-Than-Class-C or Special-Performance-Assessment-Required wastes. Therefore, DOE has not included either waste type in the Proposed Action inventory for the consideration of potential impacts that could occur from the disposal of spent nuclear fuel and high-level radioactive wastes in a geologic repository at Yucca Mountain. The disposal of these wastes at Yucca Mountain, however, is part of the cumulative impact analysis (see Chapter 8) because the impacts of that disposal are reasonably foreseeable as the results of future actions.

Further, DOE has not included Module 2 in its consideration of potential impacts under the No-Action Alternative. DOE does not have enough information about Module 2 wastes at present to be able to perform a meaningful analysis with respect to the No-Action Alternative. As discussed in Appendix A, Section A.2.5, Greater-Than-Class-C waste could include, for example, certain commercial nuclear powerplant operating and decommissioning wastes and sealed radioisotope sources. DOE Special-Performance-Assessment-Required waste could include certain production reactor operating wastes, production and research reactor decommissioning wastes, sealed radioisotope sources, and isotope production-related wastes (see Appendix A, Section A.2.6). As just one example of the confounding potential sources of these types of wastes, in 1993 DOE estimated that 2,552 Greater-Than-Class-C low-level waste fixed-gauge and X-ray fluorescence sealed sources (general licensees) and 7,582 sealed sources (for example, calibration, medical, well logging sources) were used and stored by private industry at hundreds of locations in the United States (DIRS 101798-DOE 1994, all).

As this example illustrates, a meaningful analysis would need to consider the sites, or combination of sites, at which these waste types are currently in use and storage. The analytic approach used to construct the regional representative sites for which the continued storage of spent nuclear fuel and high-level radioactive waste was evaluated would not apply to the hundreds of additional locations associated with Greater-Than-Class-C and Special-Performance-Assessment-Required wastes.

For the spent nuclear fuel and high-level radioactive waste analysis in this EIS (see Appendix K, Section K.2.1), DOE collected information from published sources for each of the 77 sites where spent nuclear fuel and high-level radioactive waste is located and, to simplify the analysis, divided the country into five regions. The Department then configured a single hypothetical site in each region (see Appendix K, Section K.2.1.6), which enabled it to estimate the potential release rate of the radionuclide inventory from the spent nuclear fuel and high-level radioactive waste, based on forecast interactions of the environment (rainfall, freeze-thaw cycle) with the engineered barrier (concrete storage modules).

Environmental information at the hundreds of sites in which Greater-Than-Class-C and Special-Performance-Assessment-Required wastes are in use and storage is not readily available and DOE could not obtain it without an exorbitant commitment of resources. Relevant environmental evaluations such as those prepared by the Nuclear Regulatory Commission for operating commercial nuclear powerplants or spent nuclear fuel storage installations are not available for most of the locations at which these waste types are in use or storage. Further, the manner in which Greater-Than-Class-C and Special-Performance-Assessment-Required low-level wastes are stored varies by waste types, and the great

variety of storage methods could not be simplified for analytical purposes without distorting the resulting potential environmental impacts.

Even if such information were gathered and the means of storage could be reduced by the use of simplifying assumptions, the results of the analysis (the impacts) would tend to reinforce the results of the impact analysis performed for the Module 1 inventory. That is, short-term impacts such as those to socioeconomics and land use would not increase appreciably, but health effects probably would increase over the long term because workers and the public would be exposed to these waste types in addition to spent nuclear fuel and high-level radioactive waste at the many locations across the United States.

7.3.1 SHORT-TERM IMPACTS IN THE YUCCA MOUNTAIN VICINITY

Candidate materials would not be transported to the repository. Therefore, impacts from Module 1 would be the same at the Yucca Mountain site as those presented in Section 7.1.

7.3.2 SHORT- AND LONG-TERM IMPACTS AT COMMERCIAL AND DOE SITES

7.3.2.1 Land Use and Ownership

Under Scenario 1 (long-term institutional control), as discussed in Section 7.2.1.1, the land required for storage facilities typically would be a few acres. For the Module 1 inventory, the analysis assumed that the land required would increase, on average, by about 60 percent (the ratio of Proposed Action and Module 1 inventories). This additional land requirement [less than 0.04 square kilometer (10 acres) per site] would represent a small percentage of the land currently available at the sites; therefore, the incremental impacts on land use would be minimal but larger than those for the Proposed Action facilities. These storage facilities would be on land currently owned by DOE or a utility and, therefore, would be unlikely to affect land ownership.

Under Scenario 2 (assumption of no effective institutional control after about 100 years), as discussed in Section 7.2.2.1, without maintenance and periodic replacement, facilities, storage containers, and the spent nuclear fuel and high-level radioactive waste would begin to deteriorate, eventually contaminating the land surrounding the storage facilities and rendering it unfit for human habitation or agricultural uses for hundreds or thousands of years. The additional inventories of Module 1 probably would increase the concentrations of radioactive materials in the soils and the size of the affected areas over those expected for the Proposed Action inventory. As with the Proposed Action, these concentrations and areas would be difficult to estimate but even with the additional inventories of Module 1, DOE believes it would involve less than several hundred acres at each of the 77 sites.

In addition, as with the Proposed Action, because Scenario 2 assumes no effective institutional control after approximately 100 years, there would not be an orderly conversion of land use and ownership to other uses or ownership. Therefore, the potential for members of the public to move onto storage facility lands with Module 1 inventories would be unchanged from that expected for the Proposed Action.

7.3.2.2 Air Quality

As discussed in Section 7.2.1.2, under Scenario 1 best management practices and effective monitoring procedures would ensure that contaminant releases to the air would be minimal and would not exceed current regulatory limits (40 CFR Part 61 for hazardous air pollutants emissions and Part 50 for air quality standards). In addition, DOE expects that these controls would be effective with the additional inventories of Module 1. Therefore, air quality under Scenario 1, Module 1 would not be adversely affected during routine operations.

As discussed in Section 7.2.1.2, during the construction of replacement facilities, exhaust from construction vehicles would temporarily increase local concentrations of hydrocarbons, carbon monoxide, and oxides of nitrogen for a few years during each 100 years. DOE expects that these temporary increases in particulate matter resulting from construction activities would persist for slightly longer periods because of the additional facilities required to store the additional inventories of Module 1. However, mitigation measures such as watering unpaved roads would limit the generation of fugitive dust. As with the Proposed Action, after replacement the old site would be seeded, graveled, or paved to reduce air emissions. Therefore, although adverse air quality impacts during construction would be slightly higher for the Module 1 inventory, DOE expects them to be minimal and transient.

The Module 1 air quality impacts under Scenario 2, as discussed in Section 7.2.2.2, would be minimal because even degraded facilities would limit the release of radioactive particulate material to the atmosphere.

7.3.2.3 Hydrology

7.3.2.3.1 Surface Water

For Scenario 1, as discussed in Section 7.2.1.3.1, under long-term institutional control, best management practices such as stormwater pollution prevention plans and stormwater holding ponds would ensure that, in the unlikely event of an inadvertent release, contaminants would not reach surface-water systems. These controls and monitoring procedures would be effective for the additional inventories of Module 1. Therefore, as with the Proposed Action inventory, surface-water quality would not be adversely affected by routine operations.

For long-term impacts from Scenario 2, after about 100 years when there is an assumption of no effective institutional control, the Module 1 contaminants could enter surface water via stormwater runoff from degraded facilities in quantities greater than those expected for the Proposed Action. Section 7.3.2.7.3 discusses the incremental impacts to the public expected from these additional surface water contaminants resulting from the Module 1 inventory.

7.3.2.3.2 Groundwater

Under Scenario 1, Module 1 groundwater impacts from the storage of 105,000 MTHM of commercial spent nuclear fuel, 2,500 MTHM of DOE spent nuclear fuel, and 22,280 canisters of high-level radioactive waste would be minimal because best management practices such as spill prevention and cleanup plans and procedures and effective effluent monitoring procedures would ensure that inadvertent contaminant releases did not reach groundwater.

In addition, although the analysis assumed that the average square footage of storage facilities would increase by about 60 percent for the additional Module 1 inventory, the shallow foundations of these surface structures would not disturb groundwater systems. Some additional DOE storage facilities would be subsurface structures for which construction could require minimal dewatering of the groundwater aquifer. However, the larger square footage of the Module 1 structures would be relatively small (a few acres) in relation to the size of the aquifer, so no adverse impacts would result from dewatering activities.

For long-term impacts from Scenario 2, Module 1 contaminants would be likely to enter the underlying groundwater from degraded facilities in quantities greater than those expected for the Proposed Action. Section 7.3.2.7.3 discusses the incremental impacts to the public from these additional groundwater contaminants resulting from the Module 1 inventory.

7.3.2.4 Biological Resources and Soils

For Scenario 1, as discussed in Section 7.2.1.4, under long-term institutional control, impacts to biological resources or soils from the construction every 100 years and operation of the storage facilities would be minimal for the expanded Module 1 inventory. The facilities necessary to store the expanded Module 1 inventory would be fenced to keep wildlife out and replacement facilities would be constructed on previously disturbed soil. In addition, as with the Proposed Action, spills would be contained and cleaned up immediately, thus minimizing the area of soil affected.

For long-term impacts from Scenario 2, the analysis assumed that the potential for individual animals to be exposed to radiation at the storage sites would increase in proportion to the increased Module 1 inventory in comparison to the Proposed Action inventory (approximately 60 percent). While the increased contaminant exposure could have negative effects, including death, on individual animals, adverse impacts to entire populations would be unlikely because the lethal area surrounding the degraded facilities would be limited to a few hundred acres.

Contamination of soils at the storage facilities by radioactive materials leaching from the spent nuclear fuel and high-level radioactive waste material would be likely to increase in proportion to the increase in Module 1 inventory. Appendix K, Section K.2.4, discusses impacts to members of the public from eating food grown in contaminated soils or livestock fed on such soils.

7.3.2.5 Cultural Resources

For Scenario 1, the analysis assumed that the Module 1 replacement of spent nuclear fuel and high-level radioactive waste storage facilities would increase by about 60 percent over the Proposed Action. However, these additional facilities would generally be on undeveloped land owned by DOE or the commercial utilities in rural areas. As with the Proposed Action, the size of the additional facilities and supporting infrastructure would be small enough that the facility probably would avoid known cultural resources. In addition, if previously unknown archaeological sites, human remains, or funerary objects were uncovered during construction, DOE or the commercial utility would comply with Executive Orders and Federal and state regulations for the protection of cultural resources. Therefore, construction and operations would not affect cultural resources.

For long-term impacts from Scenario 2, construction and operation for about the first 100 years would be as described for Scenario 1. After this time, no construction or operation activities would occur at the generating sites; therefore, cultural resources would not be adversely affected.

7.3.2.6 Socioeconomics

For Scenario 1, the total staff required at 77 sites to monitor, maintain, and replace the Module 1 facilities would increase from about 700 for the Proposed Action inventory of 70,000 MTHM to more than 800 for the Module 1 inventory of 105,000 MTHM (DIRS 104596-Orthen 1999, Table 6). This increase is approximately equivalent to adding no more than two individuals at each of the 77 sites. Therefore, the additional storage requirements of the Module 1 inventory would be unlikely to affect socioeconomic factors such as infrastructure and regional economy.

For long-term impacts from Scenario 2, because there is an assumption of no effective institutional control after about 100 years, there would be no workers for either the Proposed Action or Module 1 inventories. Therefore, the Module 1 socioeconomic impacts would be essentially the same as those for the Proposed Action for the first 100 years, but after that approximately 800 jobs would be lost. Because these jobs would be spread over 72 commercial and 5 DOE sites (about 10 jobs per site), socioeconomic impacts would be very small for a given region.

7.3.2.7 Occupational and Public Health and Safety

7.3.2.7.1 Nonradiation Exposures

For Scenario 1, Module 1, as with the Proposed Action, maintenance, repairs, repackaging, and construction at the storage facilities would be conducted in accordance with Occupational Health and Safety Administration and National Institute of Occupational Safety and Health requirements (29 CFR). Worker exposures to industrial nonradioactive hazardous materials during construction and operation of the storage facilities would be minimized through administrative controls and design features such that exposures would remain below hazardous levels.

For long-term impacts from Scenario 2, the increased inventory of Module 1 and resultant increase in stainless steel storage canisters would be likely to result in a proportional increase in concentrations of chemically toxic materials (such as chromium) in the groundwater and surface waters at the storage sites. However, as discussed in Section 7.2.2.5.1, these concentrations would remain extremely low and would not result in adverse human health impacts. In addition, as discussed in Section 7.2.2.5.1, the Department did not attempt to evaluate adverse health impacts resulting from dissolution of chemically toxic waste forms because it did not want to overestimate impacts from the No-Action Alternative.

7.3.2.7.2 Industrial Hazards

For Scenario 1, as discussed in Section 7.2.1.7.2, the majority of the industrial accidents would occur as a result of surveillance (about 94 percent) and construction tasks. Operations tasks would contribute less than 0.001 percent of the total number of accidents. Therefore, to estimate the number of industrial accidents that would be likely to occur at the storage sites for the Module 1 inventory, the number of additional concrete storage modules required to store the additional inventory was calculated.

For Module 1 during the approximately 100-year construction and operation cycle (2002 to 2116), about 80,000 full-time equivalent work years would be required to maintain about 11,000 concrete storage modules and 8 below-grade storage vaults at the 77 sites (DIRS 104596-Orthen 1999, Table 1). Based on this level of effort, as listed in Table 7-10, about 2,800 industrial safety incidents would be likely, resulting in about 1,200 lost workday cases and 3 fatalities (an average of about 1 fatality every 30 years).

Table 7-10. Estimated Module 1 industrial safety impacts at commercial and DOE sites during the first 100 years and the remaining 9,900-year period of analysis under Scenario 1.^a

Industrial safety impacts	Short-term (100 years) ^b construction and operation	Long-term (9,900 years) ^c construction and operation
Total recordable cases	2,800	410,000
Lost workday cases	1,200	180,000
Fatalities	3	490

a. Source: DIRS 104596-Orthen (1999, Tables 6 and 7).

b. The estimated impacts would result from a single 100-year period of storage module construction (renovation), operation, surveillance, and maintenance.

c. Period from 100 to 10,000 years.

In addition, for Module 1, Table 7-10 indicates about 410,000 projected industrial safety incidents, of which about 180,000 would be lost workday cases and 490 would involve fatalities (an average of about 1 fatality every 20 years or about 1 every 1,600 years at each of the 77 sites). Surveillance tasks would provide about 94 percent of the total worker level of effort, construction tasks would provide nearly all of the remaining 6 percent, and operations tasks would provide less than 0.001 percent.

7.3.2.7.3 Radiation Exposures

For Scenario 1, radiation exposures to offsite populations, involved workers, and noninvolved workers would increase because of the additional Module 1 inventory and the construction of additional facilities required to store the materials. The analysis assumed that radiation exposures to offsite and noninvolved worker individuals would increase by the ratio of the Module 1 inventory to the Proposed Action inventory, a factor of about 1.7. Radiation dose rates for the involved maximally exposed worker (construction) would not increase because of the self-shielding effect of the concrete storage modules. Table 7-11 lists radiological human health impacts resulting from the Module 1 inventory.

Table 7-11. Estimated Module 1 radiological human health impacts for Scenario 1.^a

Receptor	Short-term (100 years) construction and operation	Long-term (9,900 years) construction ^b and operation
<i>Population^c</i>		
MEI ^d (millirem per year)	0.34	0.10
Dose ^e (person-rem)	1,400	8,800
LCFs ^f	0.70	4.4
<i>Involved workers^g</i>		
MEI ^h (millirem per year)	170	50
Dose (person-rem)	4,700	41,000
LCFs	1.9	16
<i>Noninvolved workersⁱ</i>		
MEI ^j (millirem per year)	23	0 ^k
Dose (person-rem)	61,000	0 ^k
LCFs	25	0 ^k

- a. Source: Adapted from DIRS 101898-NRC (1991, all); DIRS 104596-Orthen (1999, all).
- b. Assumes construction of 11,000 concrete storage modules, 1 above-grade vault, and 8 below-grade vaults at 77 sites (DIRS 104596-Orthen 1999, Table 1) every 100 years.
- c. Members of the general public living within 3 kilometers (2 miles) of the facilities; estimated to be 140,000 over the first approximately 100 years and approximately 14 million over the 9,900-year long-term analysis period [estimated using DIRS 102204-Humphreys, Rollstin, and Ridgely (1997, all)].
- d. MEI = maximally exposed individual; assumed to be approximately 1.4 kilometers (0.8 mile) from the center of the storage facility (DIRS 101898-NRC 1991, p. 22).
- e. Estimated doses account for radioactive decay.
- f. LCF = latent cancer fatality; expected number of cancer fatalities for populations. Based on a risk of 0.0004 and 0.0005 latent cancer per rem for workers and members of the public, respectively (DIRS 101857-NCRP 1993, p. 112), and a life expectancy of 70 years for a member of the public and a 50-year career for workers.
- g. Involved workers would be those directly associated with construction and operation activities (DIRS 101898-NRC 1991, pp. 23 to 25). For this analysis, the involved worker population would be about 1,600 individuals (800 individuals at any one time) at 77 sites over 100 years (DIRS 104596-Orthen 1999, Table 6). This population would grow to more than 190,000 over 10,000 years.
- h. Based on maximum construction dose rate of 0.11 millirem per hour and 1,500 hours per year (DIRS 101898-NRC 1991, p. 23).
- i. Noninvolved workers would be employed at the powerplant but would not be associated with facility construction or operation. For this analysis, the noninvolved worker population would be 80,000 individuals who would receive exposure until the powerplants were decommissioned (50 years).
- j. Based on a projected area workforce of 1,200 and an average estimated annual dose of 16 person-rem (DIRS 101898-NRC 1991, p. 24).
- k. During this period the powerplants would have ended operation, so there would be no noninvolved workers.

As listed in Table 7-11, the estimated dose to the hypothetical maximally exposed offsite individual for the Module 1 inventory during the operational period between 2002 and 2116 would be about 0.34 millirem per year [adapted from DIRS 101898-NRC (1991, p. 22)]. For the remaining 9,900 years of the analysis period, the dose to the hypothetical maximally exposed individual would decrease to about 0.10 millirem per year because of radioactive decay of the source material. During about the first

100 years, the dose (accounting for radioactive decay) could result (over a 70-year lifetime of exposure) in an increase in the lifetime risk of contracting a fatal cancer of 0.0000073, an increase over the lifetime natural fatal cancer incidence rate of 0.0031 percent. During the remaining 9,900 years of the analysis period, the dose (accounting for radioactive decay) could result (over a 70-year lifetime of exposure) in an increase in the lifetime risk of contracting a fatal cancer of 0.0000022, an increase over the lifetime natural fatal cancer incidence rate of 0.00092 percent.

For the short-term impacts, over about the first 100 years the offsite exposed population of approximately 140,000 would be likely to receive a total collective dose of 1,400 person-rem (adjusted for radioactive decay). This dose could result in 0.70 latent cancer fatality in addition to the 33,000 fatal cancers likely in the exposed population from all other causes. This represents an increase of about 0.0021 percent over the estimated number of cancer fatalities that would occur in the exposed population from all other causes.

For the long-term impacts from Scenario 1, the radiation dose of 8,800 person-rem from the storage facilities could result in an additional 4.4 latent cancer fatalities in the surrounding population of about 14 million. This would be in addition to about 3.3 million cancer fatalities that would be likely to occur in the exposed population of 14 million, an increase of 0.00013 percent over the natural incidence rate.

The analysis assumed the maximally exposed individual in the involved worker population would be a construction worker involved with construction and loading of replacement facilities. Assuming a maximum dose rate of 0.11 millirem per hour (unchanged from the Proposed Action) and an average exposure time of 1,500 hours per year, this construction worker would receive about 170 millirem per year. During about the first 100 years, this dose could result (over three years of construction) in an increase in the lifetime risk of contracting a fatal cancer of 0.00020, an increase of 0.09 percent over the natural fatal cancer incidence rate. During the remaining 9,900 years of the analysis period, the dose could result (over three years of construction) in an increase in the risk of contracting a fatal cancer of 0.000060, an increase over the natural fatal cancer incidence rate of 0.03 percent.

For the involved worker population of 1,600 individuals, approximately 380 would be likely to contract a fatal cancer from some cause other than occupational exposure. In the involved population of 1,600 storage facility workers (during the first 100 years), the collective dose of 4,700 person-rem (corrected for radioactive decay) between 2002 and 2116 could result in 1.9 additional latent cancer fatalities (DIRS 104596-Orthen 1999, Table 6), which would result in an increase of 0.51 percent over the natural incidence rate of fatal cancers from all causes. During the remaining 9,900 years of the analysis period, the involved estimated worker population of more than 190,000 would receive a collective dose of about 41,000 person-rem (corrected for radioactive decay). This dose could result in 16 latent cancer fatalities in addition to the 45,000 cancer fatalities that would be likely in the exposed population from all other causes. These additional cancers would represent an increase of 0.036 percent over the natural incidence rate of fatal cancers.

The estimated Module 1 collective dose to noninvolved workers at a nuclear powerplant from the Module 1 inventory would be about 27 person-rem per year [adapted from DIRS 101898-NRC (1991, p. 24)] for the protected area workforce of 1,200 individuals (DIRS 101898-NRC 1991, p. 26) at the two-unit station at Calvert Cliffs. This collective dose would result in an average maximum dose to the noninvolved worker of 23 millirem per year. Over a 50-year career, this exposure (corrected for radioactive decay) could result in an increase in the lifetime risk of contracting a fatal cancer of 0.00032. This incremental increase in risk would represent an increase of 0.13 percent over the incidence of fatal cancers from all other causes.

In the total noninvolved worker population of 80,000 powerplant workers (all sites), the estimated Module 1 collective dose of 61,000 person-rem (corrected for decay) between 2002 and 2116 could result

in 25 additional latent cancer fatalities. This increase represents about an 0.13-percent increase over the 19,000 cancer fatalities that would be likely to occur from all other causes in the same worker population.

After about 100 years, Scenario 2 assumes no effective institutional control of the 77 sites and assumes that the storage facilities would be abandoned. Therefore, there would be no health risk for workers during that period. For the long-term impacts from Scenario 2, the analysis estimated human health impacts to the public on a regional basis (DIRS 104924-Poe 1999, p. 15). The estimated total population dose would increase from 6.6 million person-rem to about 7.3 million person-rem, resulting in an increase in the number of latent cancer fatalities from about 3,300 to almost 3,700 over the 9,900-year analysis period. Appendix K (Sections K.2.4.1 and K.3.1) contains details of the Proposed Action analysis.

7.3.2.8 Accidents

For Scenario 1, both short- and long-term accident consequences for the additional inventory of Module 1 would be bounded by the severe seismic event and could result in slightly higher impacts than those predicted for the Proposed Action inventory. However, this accident scenario would probably produce only minor radiological impacts to persons in the immediate vicinity of the storage facility.

For Scenario 2, the long-term impacts for Module 1 would be the same as those for the Proposed Action (see Section 7.2.2.7) because only a single concrete storage module would be affected, regardless of inventory.

7.3.2.9 Noise

For Scenario 1, noise levels for the Module 1 inventory should not be noticeably greater than those for the Proposed Action. Therefore, the noise would not adversely affect the hearing of facility workers or frighten wildlife from the area.

For the long-term impacts from Scenario 2, as with the Proposed Action, no noise would emanate from the facilities; therefore, no adverse impacts would occur. For about the first 100 years, noise levels would be the same as those for Scenario 1.

7.3.2.10 Aesthetics

As for the Proposed Action, Scenario 1 impacts to aesthetic or scenic resources from storage facilities resulting from the Module 1 inventory would be unlikely. Though the inventory would be larger than that for the Proposed Action, Module 1 would still require only two adjacent locations at each site. Every 100 years, a new facility would be constructed on the idle site, and the storage containers would be transferred. The old facility would be demolished and the site would remain idle for the next 100 years.

For the long-term impacts from Scenario 2, aesthetics would not change until facilities began to degrade, at which time the aesthetic value of the sites would change.

7.3.2.11 Utilities, Energy, and Materials

For Scenario 1, decommissioning and reclamation activities every 100 years associated with the increased number of concrete storage modules required for the Module 1 inventory would consume slightly more diesel fuel, gasoline, and materials than those for the Proposed Action. However, as with the Proposed Action, much equipment and many materials would be salvaged and recycled. DOE would recycle building materials as practicable. Minimal surveillance activities would require some gasoline. Therefore, the increased Module 1 inventory would not adversely affect the utility, energy, or material resources of the region or the country.

For the long-term impacts from Scenario 2, as with the Proposed Action, DOE would not use utilities, energy, or materials after about 100 years and, therefore, impacts to these resources would be unlikely.

7.3.2.12 Waste Management

Under Scenario 1, the construction of new facilities and the demolition of old facilities every 100 years (and the one-time refurbishment of existing facilities after the first 50 years) would generate construction debris and sanitary and industrial solid waste. In addition, routine repairs and maintenance to the facilities and storage containers, routine radiological surveys, and overpacking of failed containers would generate sanitary and industrial solid and low-level radioactive wastes. Because there would not be a dedicated workforce at the storage facilities, only small amounts of sanitary wastes would be generated except during periods of construction. The greatest amount of waste would be generated during the demolition of facilities at the 72 commercial and 5 DOE storage sites every 100 years. The demolition of facilities once every 100 years at all the sites would generate, on average, an estimated 1.4 million cubic meters (1.8 million cubic yards) of nonhazardous demolition debris, recyclable steel, and potentially a small amount of low-level waste if a dry storage canister failed while in storage (DIRS 104596-Orthen 1999, Table 7). The debris and wastes would be disposed of at commercial or DOE disposal facilities across the Nation. The impacts to available capacity would be spread nationwide, thus minimizing impacts to a single disposal facility. The capacities of the disposal facilities would accommodate the wastes generated at the storage facilities.

For Scenario 2, demolition activities would terminate after about 100 years and, therefore, no additional long-term waste management impacts would be likely after this period.

7.3.2.13 Environmental Justice

For Scenario 1, the potential impacts of continued storage of the Module 1 inventory with institutional control would be minimal. Therefore, minority or low-income populations would not be disproportionately or adversely affected.

For the long-term impacts from Scenario 2, the increased number of facilities required to store the Module 1 inventory could adversely affect the nearby public to a degree greater than that for the Proposed Action inventory. As with the Proposed Action inventory, nearby minority or economically disadvantaged communities could experience disproportionately high and adverse human health impacts. In addition, financial considerations could make it more difficult for members of minority or low-income populations to obtain uncontaminated resources or to move away from contaminated soils and water. Because subsistence patterns vary for minority or low-income populations, members of these populations could be exposed to greater than average doses. The result of differing potentials for exposure could result in disproportionately high and adverse impacts to minority or low-income populations.

7.3.2.14 Traffic and Transportation

For Scenario 1, the estimated number of workers commuting to and from work would increase from about 700 to about 800 (DIRS 104596-Orthen 1999, Table 7). The analysis assumed that the number of personnel required for round-the-clock surveillance would not increase but would remain at two individuals per shift per site.

The estimated number of traffic fatalities, which DOE calculated using the assumptions of Section 7.2.1.14, would be approximately 7 for the first 100 years and would increase from about 730 to about 900 for the remaining 9,900 years (DIRS 104596-Orthen 1999, Table 7).

For about the first 100 years, there would be no fatalities from exhaust emissions because there would be no construction or demolition of facilities. For the remaining 9,900 years, trucks would travel over 2.2 billion kilometers (1.4 billion miles), resulting in approximately 31 prompt traffic fatalities (DIRS 103455-Saricks and Tompkins 1999, Table 4, p. 25) and about 0.2 latent fatality from vehicle exhaust emissions.

The long-term impacts from Scenario 2 would be the same as those estimated for the first 100 years under Scenario 1 for Module 1. After the first 100 years, there would be no traffic or transportation-related impacts because all activity would cease.

7.3.2.15 Sabotage

For Scenarios 1 and 2, the risk of intruder access at each of the 77 sites would be essentially the same for Module 1 as for the Proposed Action inventory because the number of sites would remain the same. Therefore, the difficulty of maintaining 77 sites over 100 or 10,000 years also would remain essentially unchanged.

REFERENCES

Note: In an effort to ensure consistency among Yucca Mountain Project documents, DOE has altered the format of the references and some of the citations in the text in this Final EIS from those in the Draft EIS. The following list contains notes where applicable for references cited differently in the Draft EIS.

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