



Nevada Site Specific Advisory Board

October 20, 2011

Mr. Scott Wade
Assistant Manager for Environmental Management
U.S. Department of Energy, Nevada Site Office
P.O. Box 98518
Las Vegas, NV 89193-8518

SUBJECT: Draft Nevada Site-Wide Environmental Impact Statement

Dear Mr. Wade,

The Nevada Site Specific Advisory Board formed a subcommittee to review the Nevada National Security Site (NNSS) Draft Site-Wide Environmental Impact Statement (SWEIS). The subcommittee developed a number of comments on the Draft SWEIS and, those transmitted with this letter were adopted by the Full Board. The Nevada Site Specific Advisory Board offers the following recommendations and comments for consideration by the Department of Energy (DOE).

1. The NNSS Draft SWEIS describes approximately forty Mission Based Program Activities for the three alternatives (No Action, Expanded Action, and Reduced Operations). For roughly half of these forty Mission Based Program Activities, there is either no difference or no significant difference between the three alternatives, or, no difference between the No Action and Reduced Operations alternatives. Differences between the alternatives exist and are evaluated for the numbers of specific types of tests for each alternative, additions of new facilities to support new missions, and the types and amounts of waste and facilities needed. While these activities have impacts, they are not, with the possible exception of the significant increase in Low Level Waste (LLW) volumes, of such major impact that they could not have been handled in a supplement to the Environmental Impact Statement.

What is more significant, however, is the fact that there are numerous new activities, likely with potentially meaningful environmental impacts, considered in all three alternatives, for which impacts are not assessed. These new missions, which have the potential to be major federal actions, include renewable energy projects, a commercial-scale solar power generation facility, new and expanded training facilities, new nonproliferation and counterterrorism facilities, a high-speed road, a short section of full-scale railroad line, a simulated seaport facility, and a mock urban area, nuclear rocket motor development, including sequestering radionuclides released as part of emissions from tests, test beds to support research and development for sensors, high-power microwaves, and high-power lasers, a geothermal demonstration project, a geothermal research center, and the reconfiguration of Mercury.

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For each of these activities, the NNSS Draft SWEIS states that additional National Environmental Policy Act (NEPA) analysis would be required before the work could be conducted. It is difficult to understand how the Draft SWEIS meets the requirements of the NEPA when so many new Mission Based Program Activities that have the characteristics of major federal actions can be included as future activities for the NNSS and not be fully evaluated, at least at a programmatic level in the Draft SWEIS.

2. The air space above Area 25 is restricted. This is an impediment to developing commercial solar facilities. That and the current U.S. Air Force use restrictions on adjacent land seem to preclude development of a tower facility, which is the most meaningful type of facility in an area where private water supplies are oversubscribed, and the NNSS water permits are restricted to weapons related activities.
3. The NNSS Draft SWEIS does not recognize that certain elements of the Reduced Operations Alternative would have an impact on Environmental Management activities. For example, under the Reduced Operations Alternative, road maintenance on Pahute Mesa would be curtailed, effectively limiting access to the Underground Test Area monitoring wells.
4. The NNSS Draft SWEIS does not provide sufficient detail to allow meaningful evaluation of transportation shipping routes, such as the source of and the number of shipments proposed for each alternative transportation route under the constrained and unconstrained options, for each of the three alternative scenarios.

The unconstrained case is not evaluated in sufficient detail to allow independent evaluation of the associated impacts. The NNSS Waste Acceptance Criteria prohibit transportation through Las Vegas, over Hoover Dam, or over the O'Callahan-Tillman Bridge. If those criteria are meaningful requirements, they should not be changed unilaterally. Further, ongoing construction defeats any advantage that could be gained by routing wastes through the Las Vegas valley. Examples include: future modification of the I-15 / U.S. 95 interchange; continuing construction of overpasses; poorly designed interchanges at the I-215 bypasses; and a new bridge planned for the Charleston underpass. Public reaction to shipping wastes to the NNSS via the I-15 / U.S. 95 interchange, essentially through downtown Las Vegas is likely to be negative.

The Draft SWEIS includes an analysis of LLW/Mixed Low-Level Waste (MLLW) shipping routes, but notes that decisions on routing would not be made as part of this NEPA process (see comment 1). This analysis apparently was undertaken to develop a greater understanding of the potential environmental consequences of shipping such waste through and around metropolitan Las Vegas and to inform any highway routing revisions to NNSS's waste acceptance criteria.

Because the NNSS Draft SWEIS is not forthcoming about whether or not this route is seriously under consideration, meaningful comments that allow a complete assessment of impacts are not likely to be generated.

5. The current Administration's position, which is reflected in the NNSS Draft SWEIS, is that the Yucca Mountain project has been canceled. If the Yucca Mountain program has been canceled, the existing Memorandum of Understanding between the Nevada Site Office and the Office of Civilian Radioactive Waste Management, which states that the Environmental Management Program is responsible for the necessary remediation activities, must be considered. NNSS Draft SWEIS does not evaluate the impacts of remediating the Yucca Mountain site. While the document notes that "Until DOE receives appropriations for remediation of the infrastructure and buildings of the former Yucca Mountain Project, NNSA will maintain the infrastructure and buildings and provide security and support to DOE to remain compliant with Federal and state regulations pursuant to existing site permits. Upon receipt of appropriations, DOE will remediate and close the infrastructure and buildings as required by law, regulations, and applicable agreements. At the completion of site closure, DOE will initiate a long-term surveillance program;" this is more than a funding issue.

Remediation of the Yucca Mountain site will be a major federal action. It is appropriate to evaluate the impacts of this action in this SWEIS so that not only can the true costs of closing the Yucca Mountain project be understood by decision makers, but that reviewers of this SWEIS can evaluate the impacts of remediating the site.

6. We understand DOE is considering the use of the NNSS for disposal of Greater than Class C waste (in fact, NNSS is a leading candidate for this disposal) and the treatment of MLLW. The impacts of these Mission Based Program Activities are not addressed in the SWEIS.
7. Our understanding of the current NNSS land withdrawal restrictions for the NNSS suggests they are not consistent with some land uses envisioned for several potential actions described in the SWEIS, e.g. commercial solar power generation. We request DOE explain how they intend to modify the land withdrawal restrictions that need to be changed for every expanded use, and the process for making needed changes to the NNSS land withdrawal.
8. There are a number of miscellaneous comments identifying inaccuracies and needed clarifications provided in the attached notes.

The Nevada Site Specific Advisory Board thanks you for the opportunity to comment on the Nevada National Security Site Draft Site-Wide Environmental Impact Statement. We hope that these comments will be beneficial as DOE moves forward in planning for the future of the Nevada National Security Site. A representative of the Nevada Site Specific Advisory Board is available to discuss any of these issues with DOE staff, if you so desire.

Sincerely,



Kathleen Bienenstein
Chair

Enclosure

- cc: M. Nielson, DOE/HQ (EM-13) FORS
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SWEIS Committee Comments

Number	Page	Section	Comment
1. Purpose / No Preferred Alternative			
1-1	1-3	1.2	There does not seem to be any significant purpose and need for this EIS other than statement on page 1-3 as follows: "The purpose and need for agency action is to support NNSA's core missions established by Congress and the President." There should be a major federal action proposed that requires this EIS to support a "decision" but there does not appear to be any true decision to be made. It is more of a "Goldilocks" question: Is the use of the Site too much? (We should reduce activities); too little? (we should increase activities); or is it "just right" ? (We should continue existing activities). If there are true alternatives to reduce or increase activities, then specific activities to be reduced or increased should be named. This document appears to be nothing but a baseline statement of the known conditions and programs at the various on and off-site locations that is being prepared to justify any possible future decision in advance.
1-2	1-12 and 13	1.4	Since no preferred alternative is chosen in this document, it makes it a little hard to comment on the overall SWEIS. Since NNSA can choose to implement any alternative, that leaves the EIS very "open-ended".
1-3	1-12	1.4 (paragraph 7)	This information must include an assessment of impacts.
1-4	3-78	3.6	This precludes reviewers from commenting intelligently on the proposed missions.
2. If Preferred Alternative, additional comment period needed			
2-1	1-21	Table 1-2, Alternatives, 2nd comment	It is difficult to comment intelligently when there is no basis for weighting concern about an alternative. Yes, it is legal, but what is the literal intent of allowing it? Will DOE allow comments on the final SWEIS before the ROD is issued?
3. Solar and Geothermal			
3-1	1-1 and 1-3	1.1	None of the land withdrawal actions or the Administrative Orders or Public laws allows for the Nevada National Security Site to be used for commercial activities such as electrical power generation.

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Number	Page	Section	Comment
3-2	1-3 and 1-4	1.2	NNSS was not established to serve as a waste disposal site for off-site generated defense wastes, or commercial generation of electrical power. See p1-20 for land withdrawal scoping comments. 1996 EIS comments: concurrence to use the NNSS for any other activity outside of research, development, and testing of nuclear weapons was never formally considered, as required by law. Nevada officials do not concur that DOE has the authority under the existing withdrawal, nor has completed the required analysis under NEPA, to support a major waste disposal program at NTS. Department of Energy/EIS-0200-F PEIS WM should have taken care of the disposal part of this. Executive Orders 13212 and 13514, and the 2005 EnPAct only direct conservation, not change NNSS mission. So, there is no justification for commercial use of NNSS for electricity generation, but power generation for use on NNSS is probably justified.
3-3	1-4	1.3	There is no justification for commercial use of NNSS for electricity generation, but power generation for use on NNSS is probably justified.
3-4	1-27	Table 1-2, Renewable Energy, last comment response	There are two issues here. One is commercial power production masquerading as demonstration of the viability of cutting-edge technologies. The other is preparing an Environmental Impact Statement for future missions of the Nevada National Security Site and not adequately addressing impacts. It is not possible to comment on the SWEIS when assessing the impacts of the missions that lead to impacts are postponed.
3-5	3-40 and 3-41	3.2.3.2	This is not consistent with Nevada National Security Site land withdrawals. There is no Section 3.1.4.2. How then can you include a new transmission line without assessing the impacts of developing it. It took years to get the "new" existing line in.
3-6	3-77	3.5.4	It is unclear if this section is intended to address the same issue as 3.2.3.2., specifically the proposed solar project. If so, the SWEIS seems inconsistent in its discussion of this issue. It is agreed that the issue should be addressed as stated in 3.2.3.2, i.e., a separate more detailed analysis.
3-7	4-3	4.1.1.1 (4th paragraph on page)	Without such a PEIS, how can commercial solar be included in this SWEIS – that is assuming that somehow the Land Withdrawals can legally be amended?
3-8	4-7 and 4-9	4.1.1.3 (1-8 paragraphs)	It is not clear that commercial development for solar, or geothermal for that matter, should be legally any different from the public access and mining restrictions .
3-9	4-12	4.1.1.5 (3rd paragraph)	The airspace is restricted – how then can the Department of Energy allow commercial use?

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Number	Page	Section	Comment
3-10	4-56	4.1.5.2.6	I think there should have been cross references between this section and 3.2.3.2
3-11	D-63	D.2.2.1	Mention is made that the construction emissions for the proposed power generation facility were scaled based on generating capacity from the Amargosa Farm Road Energy Project. However, the numbers for these emissions from the various proposed NNSS solar facilities are not shown in this entire discussion about emissions under the Expanded Operations Alternative.
3-12	D-68	D.2.2.2.1	Similar to above comment, the emissions from construction of the proposed solar power generation facility under the Reduced Operations Alternative do not appear to be listed anywhere.
4. Reduced Operations			
4-1	3-24, 3-49, A-49, and A-52	3.1.2.2, Table 3.3, A.3, and A.3.2	No Action Alternative – UGTA paragraph states that up to 50 new groundwater characterization and monitoring wells would be developed over the next 10 years. Paragraph A.3.2, pg. A-52, states that EM activities under the Reduced Operations Alternative would be the same as under the No Action Alternative. Table 3-3, on page 3-49, reiterates that under the Reduced Operations Alternative the Environmental Management Program would be the same as under the No Action Alternative. However, in ¶ A.3, pg. A-49 the statement is made that under the Reduced Operations Alternative maintenance of roads on Pahute Mesa, Stockade Wash, and Buckboard Mesa would be terminated. These two statements regarding continuing UGTA activities vs termination of maintenance on the roads necessary to get to the current and new well sites appear to be incompatible.
4-2	8-6	8.1.3.1.2	It does not appear to be true that a significant reduction in site mission would not adversely impact EM mission. If all else at site is reduced, overhead cost to EM will skyrocket and ability to accomplish mission may be in jeopardy.
5. Transportation			
5-1	1-12	1.4 (paragraphs 5 and 6)	“informing any highway routing revisions” without analyzing the potential impacts seems inconsistent with NEPA requirements.
5-2	1-12 and 1-13	1.4	Why will no decision be made as to recommended transportation routes for waste shipped to the NNSS?
5-3	1-23	Table 1-2, Waste Disposal, 2nd comment	Non-responsive - the purpose of this Environmental Impact Statement ought to be to understand the impacts based on known history of shipments.

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Number	Page	Section	Comment
5-4	3-38	3.2.2.1	The statement about rail-to-truck transloading facilities seems to assume that commercial vendors would establish such a facility if the 'Expanded Action' alternative is chosen. Do the various analyses of increased transportation requirements, discussed later in the EIS, include the increased truck traffic if such a facility is not established?
5-5	3-51	Table 3-3	The transportation fatalities don't seem to scale with the increase in the number of shipments.
5-6	4-25 and 4-26	4.1.3.2.1 (2nd sentence)	This is incorrect. Also, the following Map shows 160 as the most commonly used truck route.
5-7	4-32 and 5-67	Tables 4-11 and 5-19	7.7 miles east of 372 with 8,900 cars passing, is roughly 3 miles from the point that is 0.6 miles east of the Clark – Nye county line with 1,600 cars passing. It is inconceivable that 8,900 – 1,600 = 7,300 cars find something to do in this relatively uninhabited region of the county.
5-8	A-41	A.2.2.1	Table A-6. The Expanded Operations Alternative calls for an additional waste generation of 11,000,000 cubic feet of waste from TTR. This waste would come from cleanup of sites Clean Slates 1, 2, & 3, Project 57 and Small Boy. How will this waste be transported to the NNSS for disposal at Area 5 (or 3)? This information is not readily apparent in the EIS.
6. Yucca Mountain			
6-1	2-13	2.5.2 (3rd paragraph)	Inconsistent action. If the site project is closed, then Department of Energy must remediate the site. There are in excess of 600,000 yd ³ of excavated rock in piles that need to be reclaimed, in addition to roads and pads. The impacts of these activities can be assessed regardless of whether or not the DOE has funds appropriated for it. Also, the operation of the Yucca Mountain project as a part of the Nevada National Security Site mission was raised in scoping as an ongoing program. The Department of Energy dropping it allowed no opportunity for the public to comment on the impacts of remediation of the disturbed land, let alone the issue of no location to dispose of wastes.
6-2	4-9	4.1.1.3 (Yucca Mountain paragraph)	The Department of Energy is responsible for returning the land to original conditions - this is a condition of existing MOUs and the impacts ought to be included in the SWEIS.
6-3	6-32	6.3.3 (1st paragraph)	Development of the Yucca Mountain Project Gateway Area assumed and Yucca Mountain is assumed to be canceled.
7. Inaccuracies and Clarifications			
7-1	viii	Table of Contents	Chapter 3 pages 3-1 to 3-10 are omitted from TOC.

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Number	Page	Section	Comment
7-2	1-3	sidebar	The last paragraph of the sidebar text box about American Indian prospective, should be the first paragraph, and would probably be better if it was a separate sidebar. A reader should not have to get to the last paragraph before being told this was text prepared by others and not a government position.
7-3	1-6	1.3.2	There should be some mention of the possibility of siting a GTCC disposal facility at the NNSS. This subject is discussed further in the SWEIS, but an initial reference should be made here.
7-4	1-17 and 1-23	1.5 and Table 1-2, Waste Disposal, 1st comment	Why doesn't the SWEIS fully consider the impacts of disposal of Greater Than Class C wastes? It is not identified as a future mission of the Nevada National Security Site. NNSS is, however, a leading candidate for the disposal site in the GTCC EIS.
7-5	1-22	Table 1-2, Nye County Impacts	It is not possible to figure out if this is addressed.
7-6	1-23	Table 1-2, Waste Disposal, Final comment	This is Greater Than Class C and should be treated explicitly.
7-7	1-28	Table 1-2, Potential Impacts, 1st comment	Disagree. It is not possible to comment on the SWEIS when assessing the impacts of the missions that lead to impacts are postponed. Preparing an Environmental Impact Statement for future missions of the Nevada National Security Site and not adequately addressing impacts does not result in an acceptable SWEIS.
7-8	2-1	2.0 and Table 1-1	Regarding a return to nuclear testing - Table 1-1 shows this is not analyzed in the SWEIS.
7-9	2-14	Chapter 2, 2.5.3, bullet 2	This bullet implies that BEEF was planned and analyzed in 1996 SWEIS and then constructed. Actually BEEF went on line in 1994, and as such is not a change since 1996. Furthermore, for all of these bullets of "changes since 1996 EIS" I recommend that the date of first operation be added.
7-10	3-20 and 4-153	3.1.2.1 and 4.1.11.1.2	"Under the no action alternative, offsite generated MLLW would not be treated at the NNSS." DOE/NV has already applied for a permit from NDEP to treat MLLW at the NNSS. This is discussed further in the EIS and this statement should be corrected. See also pg. 4-153, ¶4.1.11.1.2 The DOE has already submitted an application to NDEP for the MLLW treatment permit.

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Number	Page	Section	Comment
7-11	3-20, 3-38, and 3-39	3.1.2.1 (LLW and MLLW management), 3.2.2.1 (1st paragraph), 3.2.2.2 (last sentence)	This is 11,000,000 ft ³ of additional wastes. Unable to determine if it was included.
7-12	3-47	3.3.2	The waste management program is not addressed under the reduced operations alternative.
7-13	3-77	3.5.5	A table presenting the differences in assumptions between the 1996 and the current document would have been useful.
7-14	4-1	4.1 and 4.1.1	Both sections state the site is 57 miles from Las Vegas in different terms. 4.1.1 is better, use of term overland miles in 4.1 may be confused with road miles, and the 57 miles is direct line of site. Recommend either deleting the redundant distance sentence from one of the paragraphs, or make the use of terms, and “downtown starting point” the same.
7-15	4-14	4.1.2.1.1	Facilities: avoid exact count of buildings and trailers, these numbers change frequently, and will not be same from time of draft input to final issue date. Further down in paragraph, data is clarified with “as of November 2009” that should perhaps lead the paragraph.
7-16	4-35	Table 4-12	The table of Clark County Largest Employers is misleading. The source is NV Energy who has split up employers by billable locations or power accounts. Find a better source of data. The decision on how to group employers does not seem to be consistent. For example: All of County Government workers are grouped together with the exception of UMC where all workers are also County employees. It seems arbitrary to split up the employees that work for major hotel/casino companies by property. All MGM properties should be grouped (MGM Grand, Bellagio, numerous City Center hotels, Mirage, Luxor, etc) likewise, all Caesar’s Entertainment properties (ally's Caesar’s Palace, Harrah's, Flamingo, etc.). If all Station Casino were grouped together they also would make the list. Likewise, all U.S. government including military, civilian, VA hospitals, Postal Service, FAA, BLM etcetera should be totaled and put on the list.
7-17	4-36	Table 4-13	It is disingenuous to refer to NSTEC and Wackenhut as Nye County employers.
7-18	4-63 and 4-94	4.1.6.1	The first sentence of Surface Water Characteristics appears to contradict the American Indian Perspective of Water Resources on page 4-94. The present nature of the analysis should be highlighted. Apart from that, I though the hydrology section was particularly well written.
7-19	4-84	4.1.6.2	There is no mention of the small amount of PU found in one of the wells on Pahute Mesa.

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Number	Page	Section	Comment
7-20	4-85	Footnote	Pretty sloppy referencing.
7-21	4-91 and 4-92	UGTA and RREM Plan	This is disingenuous and indicates that the Department of Energy has a bad monitoring program if it has 10.7 max on site and 62.5% off site (conveniently not expressed as a percentage).
7-22	4-163 and 4-164	4.1.12.5	Accident History. Not all significant accidents seem to be included off the top of my head I can think of two: About 1990 two workers died in a vehicle roll over coming off Pahute Mesa in the snow late at night having worked late, and; August 1998 in U16b a tunnel worker was almost killed (heart stopped and then revived) in industrial accident. If I can think of 2 then there are likely more, this section should be given some thought and attention to completeness. If I was a relative of one of these workers and found the case omitted there is an implication my "loved one" was not "noteworthy" which could be interpreted as non-caring or insulting to their memory.
7-23	5-23, 5-24 and 5-25	5.1.2.1.2 and Table 5-4	Expanded Operations land use discussion should contain some comment re use of land for potential GTCC disposal. This use should also be included in Table 5-4, "Proposed New Infrastructure ---".
7-24	5-258	5.4.6.1.2.2	The statement that impacts would be similar to those described under the No Action Alternative is a bit of an understatement, or perhaps just misleading.
7-25	7-11	Mitigation Measure 6	The discussion of actions in the event of discovery of human remains is too presumptive that any remains found are American Indian. If remains are discovered one should first determine not a recent death (say in the last 75 years) and not a crime scene, body dump, previously unknown missing worker or trespasser, etc. After law enforcement and Nye County Coroner have complete their investigations, then anthropologist can determine if its remains of Native American or perhaps an 18th Century European explorer or 19th Century rancher/pro prospector.
7-26	8-2	8.1.1.1.2	After reams and reams of pages leading up to this section there is not very much here. This re-emphasizes the comment of "what's the point?"

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Number	Page	Section	Comment
7-27	9-3	Table	The heading “Human Health” should be renamed or a different heading of “Safety” is needed. Many of the right column citations have nothing to do with “health” and are in fact safety documents. DOE Safety and Health staff should be able to better describe the difference between safety and human health for SWEIS writers. Examples of safety but not health documents are 10CFR820, 10CFR830, DOE Order 5480.20A, and DOE Orders 420.1B, 4251.D, 433.1D, 440, (458 is protection of public health and protection of environment).
7-28	A-43	A.2.2.2	Environmental Restoration Program – Soils Project, does not mention the Double Track site. Does this mean that this site is considered remediated to acceptable standards?
7-29	D-86	D.2.5.2.1	This section does not appear to account for ground disturbance nor increased truck traffic caused by cleanup of Clean Slates 1, 2, 3, etc. (See also Table 3-6, page 3-72.)
7-30	G-2 and G-3	G.1.1.1	Why are the “traditional units” of radiation and radioactivity, i.e. curie, rad, and rem, used instead of the currently accepted International System Units of becquerels, grays, and sieverts?
7-31	G-3 and G-4	G.1.1.2 and Table G-1	The discussions in this paragraph and table are somewhat misleading. There should be some statement that “averages” vary greatly over the US. For example, radon is not a problem in the Western US, but is a big problem in the East. Air travel average is truly meaningless, since only those people who actually fly get any dose and that dose is considerably more than 1 millirem per year. The air travel dose could be expressed as the dose for a coast-to-coast flight, which would be more meaningful than the average dose. There should be some discussion that these average doses vary greatly across the US and from person-to-person.
7-32	G-42	G.3.7.1	Table G-16. Table G-16 (NNS Radiological and Chemical Facility Accidents) lists plutonium source terms for accidents in the Area 5 Waste Management facility. What is the source of this plutonium? The NSSAB has been informed that all of the TRU waste at NNS has been shipped to WIPP.
7-33		Various	Examples of citations from the Draft Site Wide Site Environmental Impact Statement that illustrate major federal actions planned or considered for the Nevada National Security Site that require additional NEPA analyses.

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Number	Page	Section	Comment
7-33a			<p>Although an analysis of LLW/MLLW shipping routes is included in this SWEIS, decisions on routing would not be made as part of this NEPA process. This analysis was undertaken to develop a greater understanding of the potential environmental consequences of shipping such waste through and around metropolitan Las Vegas and to inform any highway routing revisions to NNSA's waste acceptance criteria. P1-12</p>
7-33b			<p><i>Final Environmental Impact Statement for Construction and Operation of a Depleted Uranium Hexafluoride Conversion Facility at the Paducah, Kentucky, Site (DOE/EIS-0359) (DOE 2004d) – This environmental impact statement (EIS), tiered from the Final Programmatic Environmental Impact Statement for Alternative Strategies for the Long-Term Management and Use of Depleted Uranium Hexafluoride (DOE/EIS-0269) (DOE 1999c), considered the potential environmental impacts of construction, operation, maintenance, and decontamination and decommissioning of a proposed facility for converting depleted uranium hexafluoride to a more-stable chemical form at alternative locations within the Paducah Site. DOE evaluated transportation of the depleted uranium conversion product to a commercial facility or the NNS for disposal as LLW. The July 27, 2004, ROD (69 FR 44654) stated that DOE planned to decide the specific disposal location(s) after further NEPA review. 1-14</i></p>
7-33c			<p><i>This NNS SWEIS would not provide the basis for a DOE programmatic decision, but would provide the basis for site specific implementation of programmatic decisions that have already been made in existing programmatic EISs and other NEPA documents. DOE NEPA regulations (10 CFR 1021.330(c)) require that large, multiple-facility DOE sites, such as the NNS, prepare SWEISs. This Nevada National Security Site SWEIS addresses the full range of missions, programs, capabilities, projects, and activities under the purview of NNSA in Nevada. Table 1-2</i></p>

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Number	Page	Section	Comment
7-33d			<p>Response: Each of the three alternatives includes renewable energy projects. Each alternative includes a commercial solar power generation facility that varies among the alternatives in terms of electricity-generating capacity, as described in Chapter 3. All the commercial solar projects would be located in Area 25 of the NNSS. In addition, the Expanded Use Alternative includes a project to install a photovoltaic system in Area 6 and a project to demonstrate the feasibility of enhanced geothermal electricity-generating systems in other locations on the NNSS. In the cumulative impacts chapter (Chapter 6), a Concentrating Solar Power Validation Project for solar research and development is also evaluated. This project is intended to demonstrate the viability of cutting-edge technologies for commercial power production. Because there are no proposals for the commercial scale solar power generation facilities or geothermal electricity generation, additional NEPA review would be required if a specific proposal is considered by NNSA. Table 1-2</p>
7-33e			<p>Response: NNSA concurs with the U.S. Environmental Protection Agency comments addressing renewable energy. However, the renewable energy projects in this SWEIS are not sufficiently defined to include this level of detail and would require additional NEPA analysis before being implemented.</p>
			<p>Ch 3</p>
7-33f			<p>If a commercial solar power project were proposed at the NNSS in the future, additional project-specific NEPA analysis would be required.</p>
			<p>Therefore, additional NEPA analysis would be required to identify, analyze, and document project-specific impacts if such a commercial-scale solar power generation facility were proposed. P 3-28</p>
7-33g			<p>Training facilities. These new and expanded facilities projects are conceptual at this time and would require an appropriate level of NEPA analysis before they could be implemented. P 3-34</p>

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Number	Page	Section	Comment
7-33h			<p>Nonproliferation- and counterterrorism-related activities – NNSA nonproliferation- and counterterrorism-related activities would include four related areas: arms control, nonproliferation, nuclear forensics, and counterterrorism. Although the purpose of nonproliferation- and counterterrorism related activities would be the same as that under the No Action Alternative, new nonproliferation and counterterrorism facilities, described below, would be constructed at various locations on the NNS to undertake enhanced activities. Because the new nonproliferation and counterterrorism facilities (Arms Control Treaty Verification Test Bed, nonproliferation test bed, and Urban Warfare Complex) are still conceptual in nature and their locations are unknown, they are not fully analyzed in this SWEIS, and an appropriate level of NEPA analysis would be required before they could be implemented. O3-34</p>
7-33i			<p>DHS counterterrorism operations support would include construction of new training facilities (about 10,000 square feet of floor space). In addition, RNCTEC would be operated up to the level of a Hazard Category 2 nonreactor nuclear facility, which would allow larger amounts of radioactive material in alternative configurations to be used in tests and experiments. A high-speed road, a short section of full-scale railroad line, a simulated seaport facility, and a mock urban area would also be added to RNCTEC (DOE 2004f), requiring about 125 acres of additional land in Area 6. These new facilities are still conceptual in nature and their potential locations have not been identified. An appropriate level of additional NEPA analysis (beyond this SWEIS) would be required before NNSA makes any decision regarding these facilities. P 3-35</p>

SWEIS Committee Comments

Number	Page	Section	Comment
7-33j			<p>Support for NASA – NNSA would support NASA nuclear rocket motor development, including using existing boreholes to examine for proof of concept the use of deep alluvial basins for sequestering radionuclides released as part of emissions from tests of a yet-to-be-developed prototype nuclear rocket motor. Over about a 10-year period, NASA would not likely test a nuclear rocket motor, but may conduct proof-of-concept tests using a surrogate, such as spiked xenon, in a borehole to evaluate the effectiveness of the alluvium for this purpose. NNSA would identify and comply with all applicable regulatory requirements for both proof-of-concept experiments and any actual test of a nuclear rocket motor. If NASA proposes to test an actual nuclear rocket motor, additional NEPA analysis would be prepared. 3-35</p>
7-33k			<p>New test beds – Additional test beds would be developed to support research and development for sensors, high-power microwaves, and high-power lasers. New test beds (including approximately 50,000 square feet of new building spaces) would be constructed at various locations on the NNS and would disturb approximately 200 acres of previously undisturbed land. Because there are no specific plans for construction of these new test beds at this time, additional NEPA analysis would be necessary before they could be implemented. 3-37</p>
7-33l			<p>Under the Expanded Operations Alternative, Mercury would be reconfigured to provide the modern facilities and infrastructure necessary to support advanced experimentation and production at the NNS. Because the reconfiguration of Mercury is conceptual in nature, an appropriate level of NEPA analysis and documentation would be required before it could be implemented. 3-40</p>
7-33m			<p>The analysis in this SWEIS is based on assumptions for a representative commercial solar project (West 2010). Because there is no specific proposal for a commercial solar power-generating project, additional NEPA analysis would be required to evaluate any such proposals in the future. 3-41</p>
7-33n			<p>Because there are no specific proposals for geothermal exploration or development on the NNS at this time, additional NEPA analysis would be required before such work could be conducted. 3-41</p>