ALLIANCE FOR NUCLEAR RESPONSIBILITY

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via email

Diablo Canyon Decommissioning Engagement Panel
c/o Chuck Anders, Facilitator

Re: Public meeting of June 24, 2020 regarding decommissioning transportation issues

Dear. Mr. Anders and panel members:

This letter supplements my public comments during the above captioned meeting in regard to certain assumptions made in the "Transportation Risk Analysis by the B. John Garrick Institute for the Risk Sciences at UCLA" (June 2020), hereinafter "the Report."

The Report provides a thorough analytical review of the safety/accident risks involved in the use of railroad transportation to move extremely large volumes of decommissioning waste from the Pismo Beach Rail Yard south towards Los Angeles and beyond. My critique is not with regard to the use of rail and its relative safety as a mode of conveyance; it is about the lack of consideration by the Report as to whether rail will remain or even be a possible mode of conveyance a over a dozen years from now when the largest volume of material is estimated to leave the Diablo site (2032-2035). Without access to rail as the mode of transport, calculations regarding the number of truck trips over a parallel route, and thus quantification of additional GHG production, would need to be revised drastically.

My principle concern is that the Coast Route, as illustrated by maps contained within the Report, is owned by the Union Pacific Railroad (UP), a private corporation; and that the Report has not investigated whether the UP intends to maintain or continue ownership of that line as far into the future as the Report estimates will be needed for the Diablo decommissioning. Given the precipitous drop in freight traffic on that line, coupled with ongoing and likely increased maintenance, there may be little incentive for the UP to continue investing in the route, absent perhaps a state takeover of the line for the limited passenger trains that remain.

Oil traffic has been a staple of the Coast Line since its inception, however pipelines took away most of that business over the years, as well as depletion of the oil resource. The operation of the "oil cans" train between San Ardo and southern California ended in December of 2018.
A summary of the situation along the coast is provided in a specialized rail publication:

> The Coast Line is a secondary freight carrier. It has for years been primarily a passenger carrier with the San Joaquin Line the primary freight hauler. It is available to relieve the San Joaquin Line when needed due to congestion, but most of the time the UP doesn't have much traffic on it. The Coast Line is in much better shape under the UP than it was under the SP 30 years ago. Still it is expensive to maintain. *Much of it is wedged between ocean and cliffs. Erosion is a constant problem with the ocean undermining the tracks and there is the threat of landslide from nearby cliffs and hillsides. Recent history has seen an increase in violent storms which create much damage to infrastructure*, particularly in low lying areas such as in Ventura and Santa Barbara Counties where the Coast Line runs.[1] [emphasis added]

Since that article was first published (2012) rail traffic has further deteriorated along the Coast Line. Shifts in global markets, international trade, and oil production have drastically altered the economic landscape of freight railroading. Private railroads are undergoing drastic realignments forcing them to reevaluate their priorities. Maintaining the Coast Line may not be in the UP's best financial interest:

> One underutilized UP route that would seem to be redundant under PSR [Precision Scheduled Railroading] tenets is California's Coast Route. (Union Pacific owns between Oakland and Moorpark.) From a system freight perspective, it is circuitous, underutilized and without much current and future online freight potential. Except for local freight service and an occasional through freight, the line is an expensive holdover and congestion safety valve for the UP. From UP's perspective, what little traffic there is can be drayed to the Central Valley and loaded onto rail cars at load centers or large efficient cold warehouses (perishables). Added to this evaluation is the future risk of rising sea levels, floods and tide enhanced storm surge….
> [I]n addition if UP focuses on minimizing costs, sells the route to another operator or if the route is severed by a natural disaster, California's costs will rise as the Coast Route becomes more and more a passenger only railroad (i.e. Raton Pass).[2]

One option to keeping the Coast Line viable and maintained would be for the state or other local entity to purchase the railroad for passenger use, but even that option would circumscribe its usefulness as a freight railroad, or at least create potential conflicts for dual use, with attendant costs and expenses for capitol improvements:

> One of the benefits of the state and counties buying the Coast Line is that they would gain ownership of the excess capacity that exists on segments of the line

[1] Braymer, Noel, "Why Not Lease The Coast Line?" Steel Wheels, December 2012 as reprinted in Steel Wheels, Rail Passenger Association of California and Nevada, Second Quarter, 2019, pp. 8-9.
[2] Roberts, Steve, "California's Coast Route, 'Let's Make a Deal,'" Steel Wheels, Rail Passenger Association of California and Nevada, First Quarter 2019, pp. 6-7.

> today. Capacity requirements can be set for the needs of the passenger operation, not locked up to *protect a theoretical freight rail line capacity of 20 through freight trains per day, a volume unlikely to appear*. This protection of theoretical freight capacity drives future service expansion capital needs. Passenger oriented ownership would mean more passenger rail frequencies with less capacity investment (i.e. extended sidings). This would be a partial offset to the purchase price.
> State/county ownership changes the relationship with the freight carriers. *Any freight trains operated under the agreement would have to fit the existing sidings and siding spacings or the freight railroad would pay to extend the sidings*.[3] [emphasis added]

Thus, at some point in the next decade, both the politics and economics of railroading may impact freight capacity, operations and line maintenance in a manner that would deserve weighted consideration in the context of planning and risk management for rail transport of the largest volume of Diablo's decommissioning waste.

As a contemporary example of the problems of ongoing coastal rail maintenance, I reference the following, from the 2019 staff summary of the issue currently under consideration by the California Coastal Commission:

> The Union Pacific Railroad (UPRR) proposes to replace Narlon Bridge, which provides rail access across San Antonio Creek on northern Vandenberg Air Force Base in Santa Barbara County. **The existing bridge is over 120 years old and its steel supports have deteriorated, threatening the integrity of the bridge. Replacing the bridge is needed to maintain vital commercial rail transport** and continued public travel on Amtrak's Pacific Surfliner and Coast Starlight rail lines.[4] [emphasis added]

An issue worthy of investigation by PG&E is a determination of how many other bridges, trestles and structures are aged or degraded to the point of presenting a hazard, and an evaluation of how likely is further degradation in the next dozen years before the intense volume of Diablo wastes will be moving across them. What are the costs of repair or restoration and will either the private railroad or a public entity have the resources necessary to enact those before they are needed by PG&E? As well, it would be important to also consider the various time frames for permitting (and possible mitigation costs) needed for any such work. If, by 2035, PG&E's Diablo waste is the only freight traffic on the line, who would pay those costs? Has PG&E made any contact with UP management with regard to this?

In its responses to the above mentioned permit, the UP makes its case for approval of the needed coastal permits, and in doing so provides a statistical analysis of the line's use.

[3] Id.
[4] Staff Report, Consistency Certification No.: CC-0003-19, Th11a; California Coastal Commission, April 24, 2019, Page 1.

Currently there is only one freight train per week in each direction (which consists of mostly empty containers being ferried from one end to the other) and as the previous quotes have noted, that volume is unlikely to grow.

> A Commission objection to the proposed bridge replacement would result in adverse coastal resource effects, [including]: (3) adverse air quality, water quality, greenhouse gas emissions, and excessive energy use, which would occur if users of the rail line needed to convert to automobile and truck transport, or significantly longer alternative rail corridors. UPRR states:
> *Direct rail travel between San Luis Obispo and Santa Barbara is 119 rail miles. Train travel from San Luis Obispo to Santa Barbara would need to go through Sacramento, to Barstow, through Los Angeles, and back up to Santa Barbara, a route that covers over 1,000 miles.*
> ***If rail transport is not available between San Luis Obispo and Santa Barbara due to bridge failure or outage, surface road transport would add more than 1,000 commercial trucks per week and 1,000 cars (at 2 persons/car/day), or 7,000 cars per week x 4 weeks or about 32,000 vehicle trips per month**. Alternative rail travel would route trains via Sacramento, through the Central Valley, across the Tehachapi Range to Barstow, in order to connect to Los Angeles.*
> *Amtrak runs 6 trains per day across the Narlon Bridge**. Freight (long-haul loads) uses the rail 2 times per week**, plus local haulers use the rail 2 times per week**. Each freight train provides the equivalent of approximately 250 commercial truck trips per train**.*[5] [emphasis added]

In conclusion, A4NR remains concerned that the UCLA Report analyzes railroad transport safety from an abstract point of view without, quite literally, looking at the tracks on the ground. It is one thing to use "modeling" for railroad analysis; it is yet another to be a "model railroader." When large volumes of waste are involved, some of it potentially low-or-high-level in radioactivity, it is best to remember we are not playing with toy trains.

We appreciate your attention to this matter and look forward to your response.

Yours truly,

/s/

David Weisman
Outreach Coordinator

[5] Id., page 17.