

COMMERCIAL VEHICLE SAFETY ALLIANCE



An Association of State, Provincial and Federal Officials
Responsible for the Administration and Enforcement of Motor
Carrier Safety Laws in the United States, Canada and Mexico

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March 21, 1995

U.S. Department of Energy
C/O Lois Smith
TRW Environmental Safety System
2650 Park Tower Drive Suite 800
Vienna, Va 22180

Dear Ms. Smith:

On behalf of the Commercial Vehicle Safety Alliance (CVSA), I would like to register our comments regarding the Department of Energy's (DOE) and their Office of Civilian Radioactive Waste Management (OCRWM) request for comments on "Safe Routine Transportation and Emergency Response Training; Technical Assistance Funding" as requested in Federal Register Volume 660, No. 1, dated January 3, 1995.

In our opinion, **Option (2) - Establish Agreements with State, Local, Tribal, and Other Organizations**, is the most feasible cost effective, and efficient way to ensure that training, and emergency response funding reach the areas and agencies for which it is designed. This will promote and enhance the safe transportation of spent nuclear fuel and high level radioactive waste.

We recommend that OCRWM address 180 (c) in a two fold approach, first, through a **Safe Routine Transportation Plan**, and second, through an **Emergency Response Plan** while they provide **Technical Assistance** to both, as stipulated in the act.

In addressing Technical Assistance, we believe DOE and OCRWM should provide technical assistance by maintaining a close working relationship with the organizations designated to address both Safe Routine Transportation and Emergency Response. Technical assistance should be in the form of financial and organizational expertise which DOE and OCRWM have at their disposal, both at their headquarters and regional offices. We further believe that DOE and OCRWM should financially support training materials and equipment, including radiological survey instruments for the organization, designated to provide the training. In order to ensure an effective and uniform approach, we also recommend that DOE and OCRWM allow equipment needs to be based on the experiences of member organizations. In this regard, we believe that CVSA should designate the proper survey equipment for inspector use and provide the necessary training.

Ms. Lois Smith
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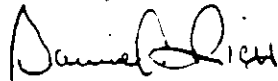
It is our opinion that the remaining options, as suggested in the Notice of Inquiry, are not conducive to providing an efficient and cost effective service while keeping out unnecessary bureaucratic roadblocks. Using existing federal agencies would only add to their mounting staffing problems and the current move to down size the Federal Government. It would also place the expertise and training agency further away from the delivery point.

It has been our experience in working with OCRWM since 1986, that we have had a mutually beneficial working relationship and have effectively delivered a valuable training product to the level for which it was intended. We believe our OCRWM Cooperative Agreement could serve as a model of efficiency and effectiveness in determining the approach OCRWM intends to follow in complying with Section 180 (c) of the Nuclear Waste Policy Act.

Under a separate document, CVSA will be submitting a comprehensive proposal to OCRWM which will describe how we can effectively assist them in meeting the mandate of Section 180 (c) and provide a Safe Routine Transportation Plan.

Thank you for the opportunity to comment on the Notice of Inquiry. Please contact me if you have any questions regarding this correspondence.

Sincerely,



David C. Rich, President
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Bethesda, MD 20814