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April 5, 1995

Ms. Lois Smith
U.S. Department of Energy
c/o TRW Environmental Safety Systems
2650 Park Tower Drive, Suite 800
ATTN: Section 180 Comments
Vienna, VA 22180

Dear Ms. Smith:

I had the pleasure of visiting with Kate Latham recently at the Association of American Railroads' Bureau of Explosives Hazmat Seminar in Dallas, Texas. Kate gave me a "Notice of inquiry" soliciting comments regarding implementation of Section 180(c), and urged me to write you with my thoughts on the matter.

The Association of American Railroads (AAR) has a keen interest in providing the training referred to in the notice, and we are in fact currently providing similar training for DOE's TETRA responders at the Transportation Technology Center (TTC) near Pueblo, Colorado. As you may know, the Transportation Technology Center is owned by the Federal Railroad Administration and operated by the AAR under a Care, Custody and Control Agreement. With over 52 square miles of property and an existing hazardous materials training center which includes 6 modern classrooms, over 70 rail and highway vehicles, and an experienced staff of ten full-time instructors, AAR/TTC is a natural choice to partner with DOE in providing this training. Our existing TETRA Rail Program could be readily modified with input from DOE to fulfill the requirements of Section 180(c). Inasmuch as AAR/TTC already has most of the props which would be required (including mock casks), the program could be done much more cost effectively than if someone had to start from scratch.

In my view, a two tiered training effort is called for:


1. A basic awareness program of perhaps 4 hours. This program should be delivered to local emergency responders (i.e., firefighters, police, etc.) along the routes most likely to be used first when the shipments begin. This program would consist of classroom instruction primarily, with perhaps some visual aids such as a traveling cask for illustrative purposes. Instruction would be delivered by TTC instructors already experienced in the subject matter.

2. A Technician or Specialist level program which would be developed and offered at the TTC. This program would be offered to hazmat team members and those persons with specific responsibilities in the area of hazardous materials emergency response. Again, the approach recommended is to first target those jurisdictions most like to encounter the shipments when they begin and offer the local jurisdiction a specific number of paid tuitions to TTC.

In order to reduce the costs associated with administering such a program, I would recommend that the Department award scholarships to emergency response jurisdictions and let the local authorities designate who from their areas should be sent to TTC to receive the training. This proposal would allow the Department to contract directly with the AAR/TTC to provide the training and the responsibility for student selection would fall to the local emergency response authority (Fire Chief, LEPC, etc.) where it properly belongs. As I said earlier, this approach would significantly reduce the cost associated with administering the program.

As far as I can tell, the arrangement I have described above would most closely match Option 3, in the Notice of inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read "J. C. Davis". The signature is stylized with a large, looping initial "J" and a cursive "Davis".

J. C. Davis, Sr. Manager Training
and Emergency Services

cc

P. C. Conlon

R. E. Fronczak

C. N. Jones