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Southern States Energy Board

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September 28, 1995

Corinne Macaluso
U.S. Department of Energy
c/o Lois Smith, TRW Environmental Safety Systems
2650 Park Tower Drive
Suite 800
Vienna, Virginia 22180

ATTN: Section 180(c) Comments

Dear Ms. Macaluso:

The Southern States Energy Board (SSEB) Advisory Committee on Radioactive Materials Transportation is pleased to submit the following comments in response to the U.S. Department of Energy's (DOE) Notice of Inquiry concerning the Office of Civilian Radioactive Waste Management (OCRWM) Safe Transportation and Emergency Response Training; Technical Assistance and Funding (July 18, 1995). These comments supplement the committee's initial response letter, which was submitted May 16, 1995.

General Comments

The SSEB Advisory Committee concurs with the general theme outlined in the Notice of Inquiry that DOE should take into account the low level of risk presented by spent nuclear fuel and high-level radioactive waste shipments and proportion the assistance and training accordingly. Information provided to the public and state and local officials must emphasize this point. It is equally important that the training offered to responders also considers the actual risk of these shipments.

Training

Training should not begin too far in advance of the shipments. Planning for the training and for providing public information can and should occur well in advance of the shipments, but the actual training should not be conducted until shipments are imminent. If the training is conducted too soon, it may be of little benefit either due to high turnover rates with first responder organizations or the skills and knowledge may become "rusty" due to lack of use. Periodic refresher training should be considered after the shipments begin, but should not be necessary prior to the first shipment.



3991
Charleston
Dallas
Denver
State 100
Virginia
Georgia
00021

770) 242-7712
fax (770) 242-0421

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The committee supports the use of DOE training courses, and is especially interested in seeing DOE's former Radiological Emergency Response Operations (RERO) course in Nevada revitalized for the purposes of implementing Section 180(c). This is an outstanding course at an excellent facility and would appropriately serve the purposes of providing this training.

The focus of training should be on enabling first responders to recognize the hazard and provide the state's radiation specialist valid information. It is probably necessary, from a public interest perspective, to supply first responders with some minimal detection capability. Simple instrumentation would be sufficient for first responders, although more significant instrumentation will be necessary for "second" responders. The funding mechanism should enable the state's radiation protection specialist the ability to purchase instruments needed for this purpose if the equipment is not already available.

Definitions

The definitions supplied by the TEC/WG for safe routine transport and technical assistance are preferred over the definitions in the strategy document.

Use of Funds and the Funding Mechanism

Stakeholder input on the use of the funds is extremely important and needs to be considered early on in the process. The funding mechanism should not require a state or local government match. If matching funds are required, they should be soft and flexible. Sufficient monies should be provided to supply all of the costs for state and local governments. A direct grant program to states is an acceptable option for implementing Section 180(c). The grants would go directly to the appropriate state programs, radiation control and emergency management, that have a need for and submit acceptable applications for the funds. The committee does not support the use of FEMA's cooperative agreement as a funding mechanism. If direct grants are cumbersome and some administrative funnel is necessary, regional structures such as the SSEB should be used.

Allocation Formulas

The committee stands by its proposal for funding allocation formulas. The population at risk and the potential for an accident (more miles and more shipments) are important considerations.

Thank you for your consideration of our comments. We look forward to providing input on future Department of Energy programs and policies. If you have any questions, please contact me at (770) 242-7712.

Sincerely,



Chris Wells
Research Assistant
Staff, SSEB Advisory Committee on
Radioactive Materials Transportation