



*Board of County Commissioners  
Lincoln County, Nevada*

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August 5, 1996

Ms. Corrine Macaluso  
U.S. Department of Energy  
c/o Lois Smith  
TRW Environmental Safety Systems, Inc.  
600 Maryland Avenue, S.W.  
Suite 695  
Washington, D.C. 20024  
Attn: Section 180(c) Comments

RE: Lincoln County, Nevada Comments to Notice of Proposed Policy and Procedures for Implementation of Section 180(c) of the Nuclear Waste Policy Act

Dear Ms. Macaluso:

In response to DOE's May 16, 1996 Federal Register notice, the Board of Lincoln County Commissioners is submitting the following comments to DOE's proposed policy and procedures for implementation of Section 180(c) of the Nuclear Waste Policy Act.

1. Although DOE intends to begin the grant and technical assistance program process four years prior to transportation, it is not clear that local emergency first responders would have been adequately trained and equipped prior to the first shipments moving through an affected jurisdiction. The grant application process should allow enough time for responders to have been trained. Grant applicants should be required to demonstrate that grant funds will be used in a manner which will result in first responders having been trained in advance of transportation.

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2. Lincoln County remains skeptical about the effectiveness of providing training funds exclusively to states rather than also to affected local governments. DOE's proposal to require states to demonstrate how coordination with local jurisdictions will occur may not guarantee adequate training of local first responders. The final policy should require states to demonstrate how grant funds will result in training of local first responders prior to shipments passing through affected areas.
3. Lincoln County supports DOE's proposal to allow a portion of 180(c) funds to be utilized for purchase of appropriate equipment. However, the limitation in spending for equipment of ten-percent may be overly restrictive and appears somewhat arbitrary. Rather, DOE might allow grant applicants to propose various levels of fund allocations for equipment purchases as may be appropriate for each area. Such an approach might better reflect geographic differences in need and would also allow a transition in the use of funds from training in early years to equipping in later years.
4. Lincoln County concurs with DOE's proposal to distribute Section 180(c) funds through an OCRWM grants program. As noted in the County's previously submitted comments, other alternatives considered would have resulted in greater federal administrative cost and less funding being available for actual training.
5. The Base Amount estimates contained within Appendix A for planning and coordination suggest "that a percentage of that salary" (the salary of a health physicist in the employ of the state) would be granted to states. The final policy should clarify specifically what percentage of the cost of the position would be covered under Section 180(c) funds. Lincoln County recommends that no less than 75 percent of the cost of the position be provided through grant funds. This amount will help to encourage state funding of the balance.

Should you have any questions regarding these comments, please do not hesitate to contact Mr. Jason Pitts of my staff at (702) 962-5497.

Sincerely,

  
Edward E. Wright  
Chairman

EW/jp