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August 12, 1996

Ms. Corrine Macaluso
Environmental and Operational Activities
Office of Civilian Radioactive Waste Management, RW-45
1000 Independence Ave., SW
Washington, D.C. 20585

Subject: Comments on Proposed Policies and Procedures for
Implementing Section 180©, Nuclear Waste Policy
Act of 1982

Dear Ms. Macaluso:

The League of Women Voters Education Fund (LWVEF) Nuclear Waste Education Project Manager has reviewed the *Proposed Policies and Procedures for Implementing Section 180©, Nuclear Waste Policy Act of 1982*, as issued by the Department of Energy, Office of Civilian Radioactive Waste Management, in vol. 61, No. 967 of the *Federal Register*. LWVEF hereby offers the following comments on the proposed policies and procedures.

Most noteworthy in the document, LWVEF acknowledges the significant role set forth for the states and tribes as the eligible jurisdictions. The jurisdictions must apply for and administer the training grants and in so doing, they must monitor OCRWM's process for identifying routes and scheduling shipments and know the status of all potentially affected communities within the jurisdiction so as to be ready, administratively, to apply for training and technical assistance funds to serve appropriate communities.

Furthermore, the application requires a three-year plan detailing how the funds would be spent each year, a demonstration of how the local jurisdictions are benefiting from the program, and a description of the applicant's procedure for coordinating local participation in the program, all of which necessitate the presence of staff with the programmatic know-how to compile the information and manage decisions.

Based upon concerns raised by and on behalf of local communities about the adequacy of training and technical assistance available to them, LWVEF requests DOE to include within *Policies and Procedures for Implementing Section 180©, Part II - History*, information that illuminates DOE's basis for assuming that states and tribes have the readiness, financial capability and will to fulfill the role outlined for them. A paragraph explaining the logical basis for and the workability of this approach will enable jurisdictions to find common ground, where useful. The information also will offer direction to state, tribal and local officials ultimately responsible for demonstrating response capabilities.

LWVEF also recommends that the information packet DOE plans to prepare, as referred to in the Definition of Key Terms Section, under *Technical Assistance*, include a clear layout of training combinations and sequences found to be effective for jurisdictions. Given the experience that should be brought to bear on developing the information packet, LWVEF further recommends that DOE consult the Transportation External Coordination Working Group for input.

Finally, consistent with comments raised by local government representatives, transportation professionals and emergency response personnel at the July 16-18, 1996, Transportation External Coordination Working Group Meeting in Pittsburgh, and based on proven training experience within the auspices of our own organization, LWVEF disagrees with the exclusion of drills and exercises in eligibility for funding under Section 180© policies and procedures. As noted by the aforementioned, such on-the-scene activities are among the most effective means to train people in new behaviors; hands on methods are the way in which people learn.

We commend the Department on its extensive efforts to refine these policies and procedures and appreciate the opportunity to have input.

If you have any questions concerning our comments, please contact Sharon Lloyd O'Connor, the LWVEF Nuclear Waste Education Project Manager at extension 278.

Sincerely,



Becky Cain
President