



MCT INDUSTRIES, INC.

GOVERNMENT DIVISION

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October 4, 1996

Ms. Corinne 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. 2002
Attn : Section 180 (c) Comments.

Dear Ms. Macaluso:

We received in late July, 1996, a Draft copy of the Waste Acceptance, Storage, and Transportation, Concept of Operation document. The Draft requested comments to be returned by August 15, 1996, however, due to the late date of receipt of the Draft we are returning our comments attached. In addition we have attached Assumptions for clarification to the seven Assumptions listed in your transmittal. We would appreciate clarification to the comments and assumptions. Thank you for the opportunity to participate in this program.

In addition we respectfully request any additional information that may be available at this time. MCT, Industries, Inc., wishes to be considered as a prospective bidder in this transportation program. The primary contact for this program will be Bob Spooner, Transportation Manager. Please direct all correspondence pertaining to this program to Mr. Spooner. He may be contacted at 1-800-876-8651 or 505-345-8651. We look forward to hearing from you.

Sincerely



Ted Martinez
President, MCT, Industries Inc.

STATEMENT OF WORK FOR WASTE ACCEPTANCE AND TRANSPORTATION SERVICES

**COMMENTS AND QUESTIONS TO DRAFT STATEMENT DATED
JUNE 1996**

Page 4 - 26

1.4.1 Activities at Purchasers' Sites, last paragraph:

Comment: Route Designation is the responsibility of the States, Tribes and Local governments the RSA is responsible to utilize the designated routes as requested by the States, Tribes and Local governments and approved by the Department of Transportation (DOT). The Nuclear Regulatory Commission (NRC) does not approve or review route designations unless the OCRWM program is under different regulations.

1.4.2 Activities During Transport

Paragraph 1: Question: Define "The RSA shall provide for: in-transit physical protection."

Comment: Suggest that Escorts accompanying in-transit shipment should use the same tracking systems as the RSA and carriers. Similar to TRANSCOM.

Paragraph 2: Question: Will OCRWM provide for Emergency Response Training for States, Tribal and Local governments or will this be the responsibility of the RSAs?

Paragraph 3: Question: Approximately what percentage of shipments will be shipped by rail and the percentage to be shipped over the highways? Will OCRWM provide the permits required by the states for highway shipments.

1.4.3 Activities at Designated Federal Facility

Paragraph 1: please define " appropriate storage systems for the SNF being delivered"?

Page 5 - 26

1.5 QUALITY ASSURANCE REQUIREMENTS

Reference to Quality Assurance Requirements and Description (QARD) Is this document available for distribution, if so please forward a copy for our use.

Page 8 - 26

2.3 PHASE B: ACQUISITION OF HARDWARE ITEMS AND MOBILIZATION

General Questions: Has the waste acceptance criteria been developed and is it available for distribution? Is all SNF expected to be transported and in repository within the eight year contract period?

Page 10 - 26 and 11 - 26

3.2 DEPARTMENT OF ENERGY DOCUMENTS

- b. Multi-Purpose Canister (MPC) Subsystem Design Procurement Specification DBG00000-01717-6300-00001; is this document available for distribution?

Assumption 1: Allocation of acceptance capacity will continue to be based on an "oldest-fuel-first" priority ranking. Any deviations from such allocations must be done with the consent of the affected Purchaser(s).

- Assumption that the priority is provided by the Purchaser(s) in advance of the scheduled shipping dates.
- Assumption that the carrier(s) will be provided advance notification of any priority shipping changes.

Assumption 2: The RSAs acquire, and deliver the storage modules for canistered and uncanistered SNF, as well as any transportable storage casks that the RSAs will be using.

- Assumption that RSAs will competitively bid fabrication of storage modules as well as transportable storage casks.
- Assumption that the RSAs will be comprised of teams having expertise in transportation, packaging, waste characterization, emergency response, etc., and that each team will be awarded contracts according to their specific expertise.

Assumption 3: In the absence of specific routing three years prior to initial shipment, OCRWM will be able to determine which States and Tribes are impacted to support the allocation of 180 (c) funds - even without RSA input. The proposed routing information will be available from the RSAs two years prior to commencing transportation and storage operations (which is one year after contract award).

- Assumption, since the RSAs will not be required to coordinate with the States, Tribes, and local governments in the designation of preferred routes, it is assumed that the requests by the States, Tribes and local governments to the Department of Transportation (DOT) will have received approval from the DOT and the DOT required emergency response training is either being completed or is beginning.
- Assumption that the emergency response training program has been approved by FEMA.
- Assumption that the escorts assigned to the shipments have been trained in emergency response as well as the emergency response personnel along the corridors.
- Assumption that rail personnel have received emergency response training as prescribed by the DOT. Rail shipments pose a different set of circumstances than highway transport.

Assumption 4: Although the Nuclear Regulatory Commission (NRC) currently limits notification of shipments to States, OCRWM intends to notify - or have the RSA notify - Tribal governments pending shipments through their jurisdiction as well. This is in accordance with OCRWM policy and OCRWM Order 460.2. This position will be coordinated with the NRC, and NRC concurrence with this practice will be received via the NRC's review of the OCRWM Safeguards Transportation Plan.

- Assumption that the Tribes will be afforded the same equipment as the States in order to track the shipments across their jurisdiction.
- Assumption that the Tribes receive the same emergency response training as the States and local governments.

Assumption 5: ISF design and operations will accommodate any form of NRC-approved transport or storage technology provided by an RSA; however, these technologies must be compatible with the characteristics of the Federal Facility site as identified in the ISF Topical Safety Analysis Report. In Phase I of ISF operations, this will include only canister systems and transportable storage casks; Phase II will add the capability to receive uncanistered fuel.

- Assumption the NRC-approved casks may be utilized by rail and highway transport.
- Assumption the Multi-Purpose Cask (MPC) is the primary transport cask.

Assumption 6: OCRWM will not provide a cask maintenance facility. The Federal Facility Operator will perform decontamination if required, and perform the preparations necessary to ready the unloaded cask for off-site transport by the RSA.

- Assumption the Federal Facility Operator has a NRC approved maintenance plan to perform the necessary maintenance to return the casks to service.

Assumption 7: Initially, heavy haul may be the method of transport for rail casks from intermodal transfer point on an existing main line to a Federal Facility. Such intermodal transfer and heavy haul activities will be conducted by the RSA.

- Assumption that the RSA will provide the necessary permitting for heavy haul to complete intermodal transfer.
- Assumption the contract carrier will provide the transport equipment to complete the intermodal transfer.
- Assumption the local area will receive emergency response training from the Purchaser's site to the intermodal transfer point.
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