



INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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February 7, 1997

Ms. Corinne Macaluso
U.S. Department of Energy
c/o Lois Smith
TRW Environmental Safety System, Inc.
Suite 695
600 Maryland Avenue
Washington, D. C. 20024

Attn: Section 108 (c) Comments

Dear Ms. Macaluso:

Attached are the comments of the International Association of Fire Chiefs in response to the Federal Register notice of proposed policy and procedures regarding Section 180 (c) of the Nuclear Waste Policy Act. We understand that the comment period has ended but hope our statement can still be helpful to you and the Department of Energy and can be included in your deliberations.

This issue will become increasingly important as Congress addresses the need to transport nuclear waste materials from existing nuclear power plants to a safe and suitable single storage site. The safe transportation of these materials and the ability to react positively to a transportation accident are our primary concerns.

We would like to respond to any inquiries that you may have. Please feel free to call me through the IAFC or you may contact Alan Caldwell, our Director of Government Relations, at 703-273-9815, extension 309. We look forward to hearing from you.

Very truly yours,

A handwritten signature in cursive script that reads "John M. Eversole".

Chief John Eversole, Chairman
Hazardous Materials Committee

Providing leadership for the fire and emergency services since 1873

Member International Technical Committee for the Prevention and Extinction of Fire/Comité Technique International De Prevention Et D'Extinction Des Feux (CTIF)



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Position Paper and Comments on the Proposed Policy and Procedures of Section 180 (c) of the Nuclear Waste Policy Act

The International Association of Fire Chiefs acknowledges the fact that there will be an increase in transportation activities associated with the shipment of radioactive materials, especially those associated with spent nuclear fuel assembly. We also recognize the fact that first on-the-scene responders (most often a local fire department) will be called to handle an accident involving these materials. And often, these local first responders will not be ready to handle such an accident because of a lack of knowledge, training, and equipment.

We believe that training and special equipment will be needed by these organizations to correct this situation. The IAFC will support the Department of Energy to see that this occurs in whatever fashion is required.

Following is the official position of the International Association of Fire Chiefs on this issue and our official comments on 180 (c).

- It is our position that 75% of all monies appropriated for training and equipment must be spent at the local responder level (as is prescribed with HEMTUSA overseen by the Department of Transportation).
- It is our position that at a minimum 25% of this money be allowed to be used to purchase specialized equipment for dealing with this specific problem.
- It is our position that training for the first on scene responder be a two tier approach. First level for all responders would be an awareness of radiation issue. These responders would only be expected to size up the accident scene, make rescue, contact appropriate personnel and stand by. (No instrument would be required to perform these functions.) The second level would include the same material as the first but would expand to include monitoring with instruments and making decisions with regards to scene safety as affected by the radioactive material involved. If trained to this level then proper instrumentation should be provided. These will need to be maintained and calibrated regularly so that that they will function as needed.
- We believe that a training program can be developed (and may already exist) that would be presented by video. This will allow for greatest person contact, especially in many rural areas.
- It is our position that even though radioactive material is a hazardous material, the training for this should be separate from the requirements set forth in the training requirements of OSHA 1910.120, i.e., hazardous material awareness, operation and technician level. To require training to this level would place too great a burden on this program and on emergency responders.

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- It is also our position that for the first year or so of the shipping campaign involving this waste an escort should be provided. This person(s) need(s) to be knowledgeable of radiation, have appropriate equipment, be uniformed, be knowledgeable of the Incident Command System and be ready to provide intelligence information to the Incident Commander about the condition associated with the radioactive material involved.

The IAFC is very aware of the problem of our constituents having requirements and laws thrust upon them which demand time and money from them. It is our position that any requirements placed into law with regards to this matter should consider this issue. Between 75% to 80% of fire departments in this country are volunteers who have many demands upon their time. To impose requirements that do not recognize this fact would be a sure way to see that program failure occurs. We believe that all the training required to provide adequate knowledge can be performed in 2-4 hours. If done by way of video it could also be used as a basis for retraining.