



# INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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September 11, 1997

Ms. Corine 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

SEP 16 REC'D  
ADH

ATTN: Section 180(c) Comments

Dear Ms. Macaluso,

We are pleased to take this opportunity to file additional comments on the revised DOE policy statement regarding financial assistance for training fire service personnel under the Section 180(c) program.

**Position Paper and Comments on the Proposed Policy and Procedures of Section 180(c) of the Nuclear Waste Policy Act for Implementing Technical and Financial Assistance to States for Training Public Safety Officers of Appropriate Units of Local Governments and Indian Tribes**

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. We also believe that the Department of Energy has made some improvements in their recent documents but we feel more progress is needed to protect the interest of the fire service.

*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 Du Feu (CTIF)*

hours to become a hazardous material technician, not the 24 hours you are suggesting.

- The IAFC is very aware of the problem of constituents having requirements and laws thrust upon them that 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. Seventy five percent of fire departments in this country are volunteer, their members have many demands upon their time. To impose requirements that do not recognize this fact would be a very sure way to see that program failure occurs. We believe that all the training required to provide adequate knowledge can be performed in approximately 4 hours. If done by way of video it could also be used as a basis for retraining.

We invite you to contact the IAFC if you have questions about our comments or need further clarification. Please contact Alan Caldwell, Director of Government Relations for the IAFC, at (703) 273-0911.

Very truly yours,

John M. Eversole, Chariman  
Hazardous Materials Committee

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# International Association of Fire Chiefs

## Government Relations Department

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To: Jim Parks

Date: 9/16/97

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Thanks,  
Chris