

Southern States Energy Board

(105)

September 15, 1997

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- Ms. Corinne Macaluso
- U.S. Department of Energy, RW-45
- Office of Civilian Radioactive Waste Management
- 1000 Independence Avenue, SW
- Washington, DC 20585

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- Dear Ms. Macaluso:

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- On behalf of the Southern States Energy Board (SSEB) Advisory Committee on
- Radioactive Materials Transportation, I am pleased to submit the following comments in
- response to the U.S. Department of Energy's (DOE) revised Notice of Proposed Policy and
- Procedures on "Safe Transportation and Emergency Response Training; Technical Assistance
- and Funding" that was published in the July 17, 1997, edition of the Federal Register. The
- Advisory Committee is comprised of gubernatorial appointees from each of the SSEB member
- states in the continental United States: Alabama, Arkansas, Florida, Georgia, Kentucky,
- Louisiana, Maryland, Mississippi, Missouri, North Carolina, Oklahoma, South Carolina,
- Tennessee, Texas, Virginia, and West Virginia. The committee is represented by radiological
- health professionals, state emergency response planners and other personnel with knowledge
- and expertise that pertains to the transportation of radioactive materials.

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- The following list highlights the committee's comments:

Allowable Activities for Funding - State and local governments will not be able to determine what training and equipment is necessary for safe and uneventful shipments until OCRWM establishes a plan and specific timeframe to accomplish its goals.

Basis for Cost Estimate/Funding Allocation - Base grant funding will be insufficient to accomplish the desired outcome. Parts I and II of the variable grant amount will be insufficient for any jurisdiction currently without CVSA North American Enhanced vehicle inspectors or until transportation routes are established so that affected jurisdictions are identified.

Funding Mechanism - Providing funding for a specific program at the exclusion of all other existing programs is in many instances a waste of funds. Adding program specific instruction to existing training programs will increase cost effectiveness of funds provided for all programs.

- Alabama
- Arkansas
- Florida
- Georgia
- Kentucky
- Louisiana
- Maryland
- Mississippi
- Missouri
- North Carolina
- Oklahoma
- Puerto Rico
- South Carolina
- Tennessee
- Texas
- Virgin Islands
- Virginia
- West Virginia



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Grant and Program Plan Timing - The shipment routes selected determine the number of jurisdictions affected by such shipments. The number of jurisdictions and size of the emergency response force in those jurisdictions are key factors driving the magnitude of the planning and training effort which is to be conducted. It will be extremely difficult to formulate a meaningful three-year plan outlining how grant funds will be spent without having information on shipment routes necessary to determine training requirements and scope a suitable program. Consider providing initial base grants for planning at T-3 and delaying the requirement for submission of a multi-year plan until shipment routes are known, presumably in T-2.

No "administering agency" will be able to indicate how funds would be used until a repository site is authorized and the routes of travel to the repository are established.

The Office of Civilian Radioactive Waste Management's (OCRWM) intention to announce the proposed routes two years prior to the shipments going through a state or tribal reservation is two years too late to be of any value.

Radiological Preparedness - States may be prepared to address hazardous materials incidents; however, states may not have the same level of preparedness and expertise in radiological response. Therefore, DOE should begin to assist states in evaluation of their radiological preparedness. Many states have Radiation Control Programs that have the expertise to address radiological incidents associated with spent nuclear fuel and high level-radioactive waste shipments; however, there appears to be a lack of experience in dealing with these matters outside of the Radiation Control Programs.

Radiological Response Training - Training under grants should specifically address radiological response training. The policy statement indicates grant applications be consistent with OSHA, etc. training requirements. In many instances, OSHA does not have the necessary expertise to address radiological response training. Therefore, a national approach to training for radiological incidents must be developed to ensure the safe transportation of material.

Rail Inspection - How will the Federal Railroad Administration (FRA) interact with states to ensure that rail inspections have been conducted? Should it be assumed that the FRA will also ensure that the roadbed for the entire route of travel will also be inspected and maintained in a safe and usable condition?

Training - What is the scope of technical assistance available under the Nuclear Waste Policy Act (NWPA) program? What does the term "train or otherwise prepare for" mean? Does this

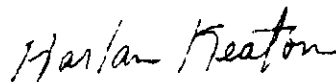
mean that the procurement of radiation detection/measurement instrumentation for use by vehicle inspectors and environmental health physicists will be an allowed expense?

Training for Local Officials and Emergency Management Personnel - The draft Policy and Procedures should be amended to specifically indicate that suitable awareness training for emergency management personnel and local officials with responsibilities for directing emergency response is an appropriate element of a NWPAs safe transportation and response training program.

Transportation Routes - In order for stakeholders to determine training requirements, DOE must establish routes of travel. Without a specific route, many states will have no choice but to train local jurisdiction first responders along all potential transportation routes. In addition, most applicants would be unable to determine their training requirements.

Once again, we appreciate the opportunity to comment on DOE's proposed policy and procedures for providing financial assistance to the states to prepare for this shipping campaign. Please feel free to contact the SSEB staff person, Ms. Beth Fulmer, at (770) 242-7712 if you have any questions.

Sincerely,



Harlan Keaton
Chairman, SSEB Advisory Committee on
Radioactive Materials Transportation