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February 9, 1995

Allen Benson  
Operational Activities Team Leader  
U.S. DOE/OCRWM (RW-45)  
1000 Independence Ave. S.W.  
Washington, DC 20585

Dear Mr. Benson:

On behalf of the newly-formed Northeast High-Level Radioactive Waste Transportation Task Force, I am writing to request that the Department of Energy extend the deadline for commenting on the Notice of Inquiry regarding Safe Transportation and Emergency Response Training, Technical Assistance, and Funding (60 FR 99; January 6, 1995).

For several years, the CSG/MLC High-Level Radioactive Waste Committee, the SSEB Advisory Committee on Radioactive Materials Transportation, and the WIEB High-Level Radioactive Waste Committee have worked with DOE to develop procedures for implementing Section 180(c) of the Nuclear Waste Policy Act. Because states are the primary stakeholders to be affected by DOE's implementation of this provision, the Northeast Task Force respectfully requests a 45-day extension of the NOI comment period. This extension would allow the Cooperative Agreement groups to discuss policy concerns and issues associated with the 180(c) provision both at the joint meeting in Chicago in April and during their individual meetings. Extending the deadline to May 18 would also provide the Northeastern Task Force - which does not meet until one week *after* the current deadline - an opportunity to comment on this important issue.

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Waste Transportation Task Force  
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The Task Force recognizes and supports DOE's desire to "fast track" the development of 180(c) policies and procedures. However, extending the comment period will only improve the quality of the input provided by the four regional Cooperative Agreement groups, which represent a significant array of stakeholders, in terms of number, expertise, and vested interest.

Thank you for considering this request. I look forward to your reply. If you have any questions, please contact me at 212-912-0128.

Sincerely,



**Russell Paule-Riggs  
Senior Policy Analyst  
CSG/ERC High-Level Radioactive  
Waste Transportation Task Force**

cc: Lisa Sattler, CSG/MLC  
Beth Fulmer, SSEB  
Michele Halseth, WIEB