

## DEPARTMENT OF TRANSPORTATION

500 South Main Street  
BISHOP, CA 93514

(619) 872-0602

March 10, 1995

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U.S. Department of Energy  
c/o TRW Environmental Safety Systems  
2650 Park Tower Drive, Suite 800  
Vienna, Virginia 22180

Attn: Lois Smith

We are responding to the Federal Register Notice regarding the Nuclear Waste Policy Act Section 180(c). Department of Energy (DOE) intends to implement a program of technical assistance and funding to train state, local and tribal public safety officials in regards to the transport of spent nuclear fuel or high-level radioactive waste. This District Office has these comments to offer:

- We agree with the statement that "Technical assistance and funds would be provided to the State, and it would be up to the State to coordinate training for local officials . . ." Existing federal, state and local emergency response plans, policies, laws and regulations to handle hazardous material incidents provide the roles, responsibilities and level of training needed. These existing processes and plans should be used as the bases for developing the training in regards to the transport of spent nuclear fuel or high-level radioactive waste.
- We would like to continue to prioritize the allocation of funds as we currently do with existing procedures for emergency response. Any incident relating to spent nuclear fuel or high-level radioactive waste will most likely occur on the State or Interstate System, and will probably be a minimum Level II response, therefore, the State will have a larger role.
- Since the potential of a spent nuclear fuel or high-level radioactive waste incident could impact a significant portion of the State (and possibly neighboring states), this incident could easily become a statewide issue, and the funds should be coordinated centrally. In California's case, the Office of Emergency Services (OES) is currently the lead agency, and would probably be the appropriate lead agency for any additional funding or coordination.
- Regarding the "Procedures for safe routine transportation," Caltrans should be the lead agency, or have extremely close coordination with the lead agency, in determining "alternate route analysis." We are responsible for ensuring the adequacy and suitability of the infrastructure of the State highways for their intended purposes and uses, and the maintenance or rehabilitation of these facilities based on those uses.
- The 180(c) procedures should consider alternate plans and processes in the event of flash flooding. It is unrealistic that a cargo or campaign will be parked waiting out the receding water levels that can take up to a week or more.

Please keep us informed as to the status of Section 180(c). If you have any questions regarding our above comments please call either Mr. Jack Bell, Hazmat Manager, at (619) 872-0736 or Ms. Katy Walton, Chief of Transportation Planning, at (619) 872-0691.

Sincerely,

A handwritten signature in black ink, appearing to read "Lewis K. Wood".

LEWIS K. WOOD  
District Director