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STATE OF OHIO
ADJUTANT GENERAL'S DEPARTMENT
2855 WEST DUBLIN GRANVILLE ROAD
COLUMBUS, OHIO 43235-2206

EMERGENCY MANAGEMENT AGENCY

AGOH-EM-RAD

September 14, 1995

Ms. Corinne 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

ATTN: Section 180 (c) Comments

Dear Ms. Smith:

This letter is a summary of the Ohio Emergency Management Agency's (EMA) comments to the Department of Energy's (DOE) Notice of Inquiry, supplemental information that was noticed in the Federal Register on July 18, 1995. Ohio EMA would like once again to state our basic contention as submitted to the original DOE Notice of Inquiry that appeared in the Federal Register on January 3, 1995.

The Federal Emergency Management Agency's (FEMA) Performance Partnership Agreement/Cooperative Agreement (PPA/CA), formerly the Comprehensive Cooperative Agreement (CCA), would provide the best mechanism for the distribution of funds and technical assistance as provided for in Section 180 (c) of the Nuclear Waste Policy Act (NWPA).

In addition, Ohio EMA agrees with the following comments as they appeared in the July 18, 1995 notice:

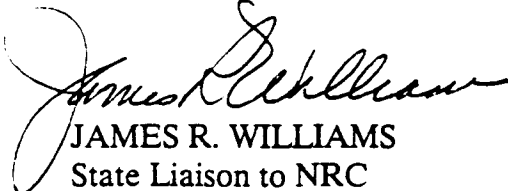
1. The Department of Energy should not initiate or should limit the number of shipments until the Section 180 (c) Program is in place.
2. The Department of Energy should quickly announce potential routes for shipments.
3. Training should begin one to three years prior to shipment. Ohio EMA prefers three years.
4. Section 180 (c) should not require any matching funds from the jurisdiction in order to receive assistance.
5. Section 180 (c) should apply to all commercial spent nuclear fuel or defense high-level radioactive waste shipments ultimately destined for a NWPA facility, whether or not those shipments are transported to and stored on an interim basis.

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Ohio EMA considers the disposal of high-level radioactive waste an important issue that requires immediate resolution. The Davis-Besse Nuclear Power Station, located in Port Clinton, Ohio, already is utilizing dry cask storage as a supplement to their spent fuel pool. Their decision to use dry cask storage has generated local concern. The Utility Radiological Safety Board of Ohio, an oversight board for nuclear power safety, has submitted comments to Washington on revisions to the NWPA. In light of these activities, Ohio EMA sincerely hopes that DOE will quickly resolve this matter and will publish a final policy and procedure for the implementation of 180 (c) prior to June 1997.

Thank you for the opportunity to submit comments on DOE's Notice of Inquiry, supplemental information.

Sincerely,



JAMES R. WILLIAMS
State Liaison to NRC

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