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Churchill County Administration Office

NUCLEAR WASTE PROJECT OFFICE

July 25, 1996

Ms. Corinne Macaluso
U.S. Department of Energy
C/O Lois Smith
TRW Environmental Safety Systems, Inc
600 Maryland Avenue SW, Suite 695
Washington, DC 20024

Re: Section 180© Comments

Dear Ms. Macaluso:

Churchill County is one of ten affected units of local government participating in the oversight of the Yucca Mountain Program. We appreciate the opportunity to provide comments on DOE's Proposed Policies and Procedures for Implementing the Emergency Response Technical Assistance and Fund Provisions of Section 180© of the Nuclear Waste Policy Act, as amended (NWPA).

Our review of the proposed policies and procedures appears to suggest a diminished role of local governments in the Section 180© training assistance funding. The intent of Section 180© is to provide appropriate local governments emergency response training for NWPA shipments. It appears that the only training available to *public safety officials of appropriate units of local government* is a self-taught awareness package while the training emphasis is placed on state agency officials. There appears to be no funding available for the training of local public safety officials.

The proposed policies and procedures makes only passing references to local government participation in emergency response training. For example, the basis for cost of the program makes no reference to the training of local public safety officials. We question how DOE intends to meet the purpose of Section 180©. The proposed policies and procedures need to ensure that appropriate local public safety officials are properly trained for NWPA shipments. The training emphasis should not be on state agency personnel.

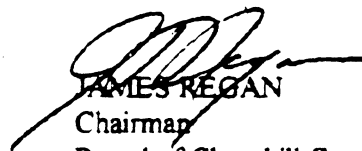
DOE's responsibility for the preparedness of local public safety officials extends beyond the grant allocation process. Churchill County is concerned that DOE is attempting to pass responsibility of local emergency response preparedness to state grant recipients without necessary funding. DOE needs to ensure that appropriate local emergency response capabilities are available for NWPA shipments.

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The amount of funding provided to state recipient does not specifically reference the training needs of local public safety officials. The level of funding provided to state recipients should be determined by the training requirements of local officials and tribes.

With these concerns in mind, it appears that the proposed policies and procedures falls well short of the intent of Section 180C and the training needs of local public safety officials. If there are any questions concerning this letter, please do not hesitate to call me at (702) 423-4784.

Sincerely,



JAMES REGAN
Chairman

Board of Churchill County Commissioners

JR:wg