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August 15, 1996
ISFSI-126-96F

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

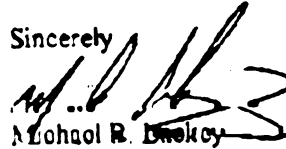
Dear Ms. Macaluso

The purpose of this letter is to transmit our comments on the Office of Civilian Radioactive Waste Management, notice of proposed policy and procedures regarding Safe Transportation and Emergency Response Training, Technical Assistance and Funding, as follows:

- The funding allocation formula should be based on probabilistic risk (route miles x annual shipments). A "source or feeder" jurisdiction (state) may have a large number of route miles, but only anticipate one (or a few) shipment per year. A "collector or main" route jurisdiction may have fewer route miles, but experience the transit of numerous shipments annually. The former jurisdiction may only need two inspectors, while the latter may need more than 3 additional hazardous materials personnel per 160 miles.
- Some of the allocated funds should be authorized to perform drills. Performing some preliminary drills in preparation for an Annual Preparedness Exercise is one of the best forms of training (hands on experience, integrating functions, jurisdiction interface and critique feedback).
- The authorized allocation of funds for training equipment should be increased from 10% to 25% as some of the training equipment for hazardous materials can be expensive.

Please contact our Mr. Dan Gildow if you have any questions regarding the above comments

Sincerely



Michael R. Brokey
Portland General Electric, Trojan Nuclear Plant
General Manager of Engineering and
Decommissioning

Dr. Carl J. Paperiello

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July 17, 1996

cc: M. G. Raddatz, NRC
L. E. Kokajko, NRC
B. W. Mc Naught, LITCO, M/S 3114

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