



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

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October 8, 1996

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

Attention: Section 180(c) Comments

Dear Ms. Macaluso:

Thank you for accepting our comments on the DOE (OCRWM) Federal Register Notice of May 16, 1996.

If this program intends only to cover high probability, low risk, radiological transportation incidents, as described in the REP-5 guidance document, then we have no comment.

If, however, low probability, high risk, incidents are to be considered in the training program, we offer the following comments:

Since many of the miles traveled by high-risk shipments could be through agricultural areas, it is possible that a major radiological accident might occur in an agricultural area. Should this happen, it will be necessary to minimize the impacts of the accident on food safety, crops and livestock and on agricultural facilities and agricultural water. We believe that planning for such an accident is important.

Radiological transportation accidents involving U.S. material and personnel have occurred elsewhere. For example, the U.S. Pershing missile transporter accident that occurred in West Germany in 1987.

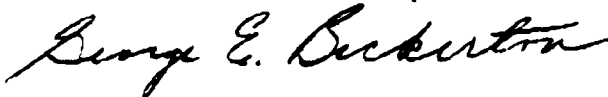
The possibility of incidents involving unauthorized shipments exists. In 1983, a cancer therapy machine owned by a hospital in Lubbock, Texas, was transported to Juarez, Mexico, where it was later stolen. Ultimately, some of the machine's six thousand

cobalt-60 pellets were spread over roadways in Mexico and others were smelted into steel that was subsequently shipped to the United States for use in the construction of several buildings. Should a terrorist incident involving nuclear weapons material occur, it would have the potential for far greater consequences.

Although the safety procedures and packaging employed in shipping radiological material greatly reduce the probability of a major incident involving an authorized shipper, this probably would not be true for unauthorized shippers.

The Food Safety and Inspection Service, U.S. Department of Agriculture, has extensive experience in training State and local governments in protecting the food ingestion pathway in the event of a radiological emergency. For high-risk incidents, it would appear that the USDA training would be valuable in preparing responders to minimize the impacts of such incidents on agriculture and the food supply. If we can be of any assistance, please let us know.

Sincerely,



George E. Bickerton, Director  
Emergency Planning Office