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September 12, 1997

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

Ref: Comments on Notice of Revised Proposed Policy and Procedures  
for the Safe Transportation and Emergency Response Training  
(Section 180(c) Program)

Dear Ms. Macaluso:

Edlow International Company appreciates the opportunity to comment on the Department's Notice of Revised Proposed Policy and Procedures for the Safe Transportation and Emergency Response Training, Section 180(c) Program. For over forty years, Edlow International has specialized in the management of radioactive material transports, including numerous movements (domestic and international) of irradiated materials.

While the nuclear power industry has a demonstrated record of safe, secure and reliable transport of radioactive materials, Edlow International recognizes the need for state and tribal jurisdictions to have available trained staff and other resources to support emergency response activities in the unlikely event of a transport accident. For this reason, Edlow International generally supports the 180(c) program as outlined in the Notice of Revised Proposed Policy and Procedures.

Edlow International also supports the Department's proposed use of continuous satellite tracking for NWPA shipments; in fact, Edlow International routinely employs satellite tracking for its shipments (spent fuel and otherwise).

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It is absurd, however, to allow access to satellite tracking information by an unlimited number of entities. If pursued further, such open access would severely compromise the security of NWPAs spent fuel shipments and create a bifurcated system in which sensitive information is handled less carefully for DOE shipments than that for other (non-NWPA) movements of spent fuel.

Further, the proposal to open access to satellite tracking information runs counter to existing U.S. law and practice. U.S. Nuclear Regulatory Commission (NRC) regulations strictly limit access to safeguards and related routing information for spent fuel shipments; restricting access to such information enhances physical protection measures by reducing the chance that sensitive information will be disseminated - inadvertently as well as willfully.

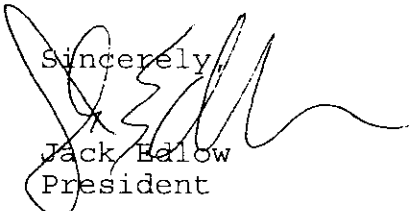
Mechanisms, such as advance notification requirements to governors' designees, already exist to provide relevant information to state and tribal authorities with regard to time of shipment and routing details. If concerns about the adequacy of these measures exist, Edlow International urges the Department, and interested stakeholders, to enter into a dialogue with the NRC in this regard.

We fear that expanding access to satellite tracking information will result in an unacceptable decrease in physical security - and one that is outside the control of the transporter. We therefore strongly urge the Department to remove from consideration increasing access to satellite tracking data.

We are pleased to respond to any questions or comments the Department may have in this regard. Please do not hesitate to contact me at (202) 483-4959.

Thank you again for the opportunity to provide our views on this important subject.

Sincerely,



Jack Edlow  
President