

INTEL OVERSIGHT PROGRAM



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Ms. Corinne Macaluso
 Waste Acceptance and Transportation Division
 Office of Civilian Radioactive Waste Management (RW-44)
 U.S. Department of Energy
 1000 Independence Avenue SW
 Washington DC 20585
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Re: Section 180(c) Comments

Dear Ms. Macaluso:

The State of Idaho offers the following comments on the Notice of Revised Proposed Policy and Procedures for Safe Transportation and Emergency Response Training; Technical Assistance and Funding as published in the Federal Register on July 17, 1997 (62 FR 38272).

As stated in its previous comments on Section 180(c) procedures submitted on September 30, 1996, the State of Idaho continues to believe that a grant program administered solely by OCRWM and specific to spent nuclear fuel and high-level waste shipments perpetuates the undesirable past practice of providing emergency preparedness training, planning, and development solely on a campaign-specific basis. Adequate response to incidents involving different radioactive materials (e.g., foreign research reactor spent fuel, naval spent fuel, commercial spent fuel, transuranic waste, etc.) involves many common elements. In addition, shipment of different materials during the same general time frame places a significant burden on the resources of sparsely populated areas, such as most of Idaho. Therefore, appropriate levels of preparedness should be based on a comprehensive understanding of potential multiple shipping campaigns. Funding should correlate to state- or tribe-specific needs, not an arbitrary formula.

By integrating funding and policy approaches for different campaigns, DOE could reduce the administrative duplication of separate programs. The difficulty of combining programs with different funding sources is recognized, but the benefits of coordinating training and planning efforts is worth the additional difficulty of developing a method for funding allocation.

We thank you for your consideration of our previous comments and for your acknowledgment of the desirability of department-wide coordination of DOE training assistance. The State of Idaho will continue to advocate a more unified, integrated approach to planning and emergency response preparedness for radiological shipments under DOE's domain.

Sincerely,


 Kathleen E. Treven
 Coordinator-Manager

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