



**General Services Commission**  
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July 29, 1998

Ms. Corinne Macaluso  
 c/o Louis Smith  
 U.S. Department of Energy  
 TRW Environmental Safety Systems, Inc.  
 600 Maryland Avenue, S.W.  
 Washington, D.C. 20024

Re: Section 180(c) Comments

Dear Ms. Macaluso:

In response to the DOE Office of Civilian Radioactive Waste Management notice of revised proposed policy and procedures for the implementation of a spent fuel and high-level radioactive waste transportation preparedness program published in the *Federal Register* on April 30, 1998, the state of Texas submits the following comments:

1. Section III, Policy and Procedures -- Objectives

Text indicates that the first part of variable grant funding may be used only to provide training for safety and enforcement inspection training for NWPA truck shipments and awareness level training for first responders. It further indicates that the second part of variable grant funding could be used for enhanced training, including operations or technician level training for responders. While it is absolutely essential to provide appropriate training for first responders, they are not the only ones who require training. Local and state elected officials and emergency management personnel are legally responsible for conducting emergency planning and directing the emergency response in many states. In addition, local officials typically have the responsibility to request state assistance if local responders cannot handle the situation. They are not first responders as defined in the Appendix to the policy statement, but they do require and should be eligible to receive appropriate training regarding safe routine shipments of spent fuel and high level radioactive waste and emergency response procedures for accidents involving those materials. We feel it is vital to provide a short training course on spent fuel and high level waste shipments to elected officials, emergency management personnel, and 9-1-1 operators in jurisdictions along shipment routes. Section 180(c) of the NWPA indicates that funds shall be made available for training public safety officials of appropriate units of local governments and Indian tribes. Limiting grant funding to

training for first responders as narrowly defined in the policy statement omits key elements of the local and state emergency response team that need to be aware of these radiological shipments and how to manage the response to accidents involving such. We strongly urge that the eligibility for grant funded training not be limited to first responders, but also include local officials with assigned emergency management responsibilities, emergency management personnel, and emergency communications personnel.

2. Section II, Policy & Procedures -- Basis for Cost Estimate/Funding Allocation

In states where cities and counties have primary responsibility for emergency planning and response to transportation accidents involving radiological materials, the work required to perform a needs assessment and develop training plans for NWPA shipments will increase dramatically as the number of jurisdictions affected by the shipments and length of highway and rail shipment routes increase. We believe the proposed \$150,000 funding for the one time planning grant will be insufficient to perform adequate planning in states where large numbers of local governments are involved and/or there are very lengthy shipment routes and strongly encourage that the planning grant be increased for states with large numbers of political jurisdictions and lengthy state and federal highway and rail mileage.

We appreciate the opportunity to comment and would be pleased to answer any questions that you may have.

Sincerely,

A handwritten signature in cursive script that reads "Roger Mulder".

ROGER MULDER  
Pantex Program Director