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July 17, 1995

Ms. Linda Desell
U.S. Department of Energy
OCRWM
1000 Independence Ave., SW
Washington, DC 20585

RE: Committee Comments on Draft DOE Guidance Documents: Escorts, Bad Weather and Road Conditions, and Shipping Campaign Definition

Dear Linda:

Attached are the comments from High-Level Radioactive Waste Committee member Ken Niles on the following DOE guidance documents: Escorts, Bad Weather and Road Conditions, and Shipping Campaign Definition. Thank you for giving the Committee the opportunity to comment on these documents.

Sincerely,

Michele Halseth
Policy Analyst

Date: June 27, 1995

To: Michelle Halseth

From: Ken Niles *KN*

Subject: Comments on TEC Documents

Fax is 3 pages

Here are my comments on the following draft DOE guidance documents: Escorts, Bad Weather and Road Conditions, and Shipping Campaign Definition.

If you have any questions about my comments, please call me at 503-378-4906.

ESCORTS

- There is an inconsistency between the 2nd paragraph of the purpose and item #2 under the "Potential escort roles include." The 2nd paragraph under purpose says "All" escorts will be knowledgeable of the commodity and of emergency, health physics and public relations procedures. Item #2 under the escort roles doesn't mention knowledge of public relations procedures. I don't believe a health physics-type escort needs to know public relations procedures and I would really prefer that person not talk to the media. But this inconsistency needs to be corrected.
- Add a bullet under "Escorts should be considered when" to include use of a new or relatively new route which has had little training/experience with radioactive material shipments in the recent past. This bullet could also be added under "Training should be considered when:"
- Each of the bullets under "Training should be considered when:" should have the following phrase added to the end: "...and there is adequate time to complete training prior to the first shipment."

John A. Kitzhaber
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BAD WEATHER AND ROAD CONDITIONS

- The first line on page two begins, "From October through April..." We should not limit this restriction to these months only. If state authorities issue travel advisories any time of the year suggesting that unnecessary travel be avoided, these shipments should not be dispatched. It's not likely this will occur during these other months, but if it does, we wouldn't want the shipments on the road.
- The first sentence in the second paragraph under number II is very awkward and should be re-written.
- The first item under "For example" under Item II says it is the state's responsibility to notify the shipper if bad weather or road conditions exist during summer months. This presumes the state has access to these shipment schedules (such as being listed on TRANSCOM).

SHIPPING CAMPAIGN DEFINITION

All of my comments on this draft document are specific to the table.

- For Spent Nuclear Fuel, the shipping campaign requirements include a "detailed Shipping Plan including emergency response activities." For High Level Waste, the shipping campaign requirements include a "detailed Transportation Plan and Emergency Response Plan." What is the difference between a shipping plan and a transportation plan? Shouldn't both type of shipment be treated the same?
- For the shipping campaign requirements for HRCQ:
 - why is stakeholder involvement "limited?"
 - why isn't the Transportation Plan "detailed?"
 - why isn't the satellite tracking continuous?
 - why isn't there a package recovery plan?
 - why is there no mention of an EA or EIS (if necessary)? For the cesium shipments, which were HRCQ, an EA was required.

Michelle Halseth
June 27, 1995
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- For the shipping campaign requirements for Truwaste:
 - what does "high level" mean, in reference to the Transportation Plan?
 - why is there no package recovery plan?

- For the shipping campaign requirements for All Other Hazardous Materials:
 - There are some cases where a transportation plan would be necessary (such as the current LSA/Nitric Acid shipments)
 - There are some cases where an EA or EIS may be necessary (again, for example, the LSA nitric acid shipments).