

March 5, 2007



Gary Lanthrum, Director
Office of Logistics Management
Office of Civilian Radioactive Waste
Management
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Dennis J. Ashworth, Ph.D., Director
Office of Transportation
Office of Environmental Management
U.S. Department of Energy
Room 5B-080
1000 Independence Avenue, S.W.
Washington, DC 20585

Dear Gary and Dennis:

On behalf of the state regional groups in the Midwest, Northeast, and West, we are writing to provide constructive feedback on DOE's Transportation External Coordination Working Group (TEC/WG). Our regions have been active participants in TEC/WG since its inception. We have willingly invested a great deal of time attending TEC/WG meetings, participated in topic groups, lead subgroups, written and reviewed work products, and, over the years, brainstormed with DOE and each other about ways to improve TEC/WG. We are concerned, however, that recent meetings have not been as productive as they could be, nor have they attracted a high level of state interest and participation. Following are some comments and a few suggestions that, we believe, may help the TEC/WG realize more of its potential to be a productive, substantive forum for reaching out to, and getting feedback from, DOE's many national stakeholders.



WESTERN
GOVERNORS'
ASSOCIATION

First, we believe the TEC/WG should return to its original purpose of addressing issues pertaining to both OCRWM's and EM's shipping activities. When EM was an active co-chair of the TEC/WG, the group contributed to some very significant products – namely, the MERRTT modules and the DOE *Radioactive Material Transportation Practices Manual*. EM's role was noticeably minor at the meeting in Atlanta, with the program scheduling a separate meeting – one that appealed to state stakeholders – on precisely the same dates. We don't think it matters why this occurred – what does matter to us is that, as spelled out in the group's work plan, the TEC/WG provides an ideal opportunity for DOE programs to communicate with each other and with their mutual stakeholders. It can, and should be, a forum for the exchange of information with stakeholders and between OCRWM and EM. We urge DOE to return to that original focus.

To help EM derive more benefit from the TEC/WG, we recommend that the program establish a standing EM Topic Group of the TEC/WG. Such a topic group could bring stakeholders together to discuss a number of EM-related

activities: TRANSCOM, revisions to the DOE Transportation Practices Manual, MERRTT-related developments, event tracking, improvements to the Prospective Shipments Report, NEPA activities related to projects such as the Greater-than-Class-C Waste EIS, and ongoing shipments (WIPP, FRR, uranium oxide, etc.). It would be especially beneficial for OCRWM to have staff serve as members of this topic group. With OCRWM an active participant on the EM Topic Group, the program can learn from EM's experience with actual shipments as well as hear the concerns and ideas of stakeholders with regard to real shipments.

Conversely, EM should assign staff to serve as members of the existing topic groups so that OCRWM can leverage the experience of these other programs as it plans future shipments of spent fuel and high-level radioactive waste. OCRWM's draft benchmarking report draws heavily from the experiences of the FRR, NNPP, and WIPP programs. It would be useful, therefore, to have representatives of these programs contribute to the discussions taking place in the Rail and Routing Topic Groups.

Second, we would like to see the TEC/WG abandon the current format of having one of the two yearly meetings focus on topic groups and the other focus on plenary sessions. In our experience, the distinction is not particularly useful. TEC/WG meetings are at their best when they provide a two-way exchange of information rather than an "information push" from several entities to the audience.

We would like to see DOE revamp the format of the TEC/WG meetings so that the emphasis is always placed on productive topic group meetings, with plenary sessions as appropriate. A major plenary session might be the second item on the agenda and would be focused on a single topic – a good example would be the plenary session in Pueblo that covered several aspects of transportation by rail. Such a single topic plenary might be planned to feed into the topics to be addressed at one or more of the topic group meetings or it might be designed to provide comprehensive and interesting information related to waste transportation.

Third, we believe the topic group meetings should be set up to accomplish specific tasks, not simply to report on what the group *has* been doing. The latter would best be handled during conference calls, whereas the meetings should give the members an opportunity to sit face to face, expand upon the discussions that have occurred on the conference calls and, then, come to some specific recommendations. For example, work products such as the Rail Topic Group's planning timeline should be discussed and revised – perhaps even finalized – during the meetings. Such a work-oriented focus would require careful planning, including distribution of materials well in advance along with a "game plan" to help members prepare accordingly. But we feel this extra effort on all our parts would make it possible for us to roll up our sleeves and truly move some projects forward.

We understand that the productivity of the topic group meetings is restricted somewhat by DOE's inability to make decisions on the spot when particular topics come up for discussion (e.g., the concept of a "suite of routes"). We realize that DOE staff need to vet ideas before signing on to them; however, simply because an idea has not yet been vetted doesn't mean there should be no discussion of the matter. We see the topic groups as providing a forum for stakeholders to discuss their ideas and develop proposals for DOE to take back to headquarters to review and, ultimately, decide whether to incorporate into the program's planning. The Section 180(c) Topic Group is an excellent example of the type and quality of work that the topic groups can accomplish when given the opportunity. We would like to see DOE commit to letting the other topic groups operate with the freedom to fully develop their ideas.

Lastly, we have some specific suggestions for improving the TEC/WG:

- To help illustrate our earlier comments about revising the format for meetings, we have attached for your consideration an agenda that lays out what we feel would be a good format to increase the productivity of the TEC/WG meetings.
- The rooms for the topic group meeting rooms should be set up to encourage discussion around the table, not hinder it. The chair or co-chair should not be at a podium, and microphones should not be necessary. If they are, then the room is probably too big for the topic group meetings.
- It would be helpful to return to the practice of reviewing all action items – with deadlines – at the end of each meeting (i.e., each topic group meeting as well as at the end of the overall TEC/WG meeting). It would be even better if the staff could also hand out a comprehensive list of action items or immediately e-mail them to the TEC/WG meeting attendees.
- Ideally, the TEC/WG website would be a comprehensive, up-to-date resource for members. Logistics and agenda information for upcoming meetings should be posted as soon as they are available. Additionally, work plans, work products, background information, member lists, conference call dates, and any reference materials should be added and maintained for each topic group.
- We acknowledge that it was largely at the regional groups' insistence that DOE opted to run topic groups consecutively and we appreciate the effort to accommodate our request. We now recognize, however, that DOE's original approach of running the meetings concurrently is the better option. Scheduling two or more of the topic group meetings to take place at the same time should make it possible for the groups to hold longer meetings. The overlap in membership would seem to be a problem mainly for the SRGs. We will address any potential scheduling conflicts by making sure we have enough representatives at the meeting to cover all the topic groups.
- It might be worth looking into the use of professional facilitators to help lead the discussion during the topic group meetings and possibly other sessions. DOE used such facilitators at the meeting in Arlington in 2003 and the results were positive. Facilitators would not be necessary during all the sessions, but good candidates would include the topic group meetings and any session intended to focus on discussion leading to a consensus or recommendation.
- DOE should return to the practice of including non-DOE members of the TEC/WG on the planning committee for each meeting. Ideally, this would include one representative from each SRG or, at a minimum, one state representative. Representatives of EM should also be on the planning committee.

We appreciate the opportunity to share with you the ideas of the SRG states and staff. We would like to follow up on our letter with a conference call to discuss positive changes to the TEC/WG. Please coordinate with Lisa Janairo at 920-458-5910 to set up a date and time for the call.

Thank you for your attention to this important matter and for your continuing support of the TEC/WG and the state regional groups.

Gary Lanthrum and Dennis Ashworth

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Sincerely,



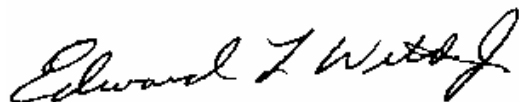
Robert Owen, Chief
Bureau of Radiation Protection
Ohio Department of Health, and
Co-Chair, CSG Midwestern Radioactive
Materials Transportation Committee



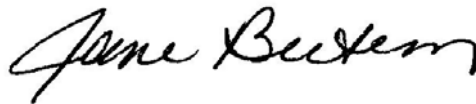
Anne deLain W. Clark
New Mexico Radioactive Waste Consultation
Task Force, and
Co-Chair, WGA WIPP Technical Advisory Group



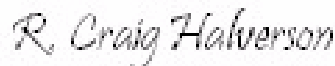
Joseph C. Strolin
Administrator, Planning Division,
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Jane Beetem, Radiological Transportation
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Natural Resources, and Co-Chair, CSG
Midwestern Radioactive Materials
Transportation Committee



R. Craig Halverson
Idaho INL Oversight and Radiation Control,
and
Co-Chair, WGA WIPP Technical Advisory
Group



Barbara Byron
Senior Nuclear Issues Policy Advisor,
California Energy Commission, and
Co-Chair, WIEB High-Level Waste
Committee

GENERIC AGENDA
(March 5, 2007)
TRANSPORTATION EXTERNAL COORDINATION WORKING GROUP (TEC)

First Day

- 7:30 a.m. — 8:00 a.m. Continental Breakfast
- 8:00 a.m. — 8:20 a.m. Welcome(s) and Meeting Overview
- 8:20 a.m. — 10:00 a.m. Plenary I
- DOE EM Program Updates
 - DOE OCRWM Program Updates
- 10:00 a.m. — 10:15 a.m. Break
- 10:15 a.m. — 12:00 p.m. Plenary II: Keynote/Special Topic Presentation/Questions & Discussion
[Maybe for Kansas City: "Transportation Impacts of TADs & GNEP" or "Details of Foreign SNF Transportation & Disposal Programs"]
- 12:00 p.m. — 1:30 p.m. Lunch (*on your own*)
- 1:30 p.m. — 3:00 p.m. Concurrent Topic Groups A, B, C (Working Session I)
- 3:00 p.m. — 3:30 p.m. Break
- 3:30 p.m. — 5:00 p.m. Concurrent Topic Groups – D, E, F (Working Session I)
- 5:30 p.m. — 7:00 p.m. No-Host Reception

Second Day

- 7:30 a.m. — 8:00 a.m. Continental Breakfast
- 8:00 a.m. — 8:15 a.m. Follow-up on questions raised or on requests made for more information re the special topic
- 8:15 a.m. — 8:45 a.m. **Brief** Topic Group Interim Reports (*things expected to get done today in each Topic Group meeting*)
- 8:45 a.m. — 10:15 a.m. Concurrent Topic Groups A, B, C (Working Session II)
- 10:15 a.m. — 10:30 a.m. Break

- 10:30 a.m. — 12:00 p.m. Concurrent Topic Groups D, E, F (Working Session II)**
- 12:30 p.m. — 1:30 p.m. Lunch** (*buffet at Conference Center*)
- 1:30 p.m. — 2:15 p.m. Concurrent Topic Groups A, B, C (Working Session III)**
- 2:15 p.m. — 3:00 p.m. Concurrent Topic Groups D, E, F (Working Session III)**
- 3:00 p.m. — 3:30 p.m. Break & Prep time for following Summary Session**
- 3:30 p.m. — 4:30 p.m. Plenary III**
- **Summary of Topic Group Work Accomplished & Action Items**
 - **Other Action Items** (*from Special Topic Sessions or from meeting in general*)
- 4:30 p.m. — 4:45 p.m. Next Meeting Discussion**
- **Date & Place**
 - **Planning Committee members**
 - **Special Topic Ideas**
- 4:45 p.m. — 5:00 p.m. Closing Remarks** (*from DOE and any other participant*)