June 6, 2002

Patrice M. Bubar
Associate Deputy Assistant Secretary
for Integration and Disposition
U.S. Department of Energy
EM-20
1000 Independence Avenue, S.W.
Washington, DC 20585

Dear Ms. Bubar:

On behalf of The Council of State Governments’ Midwestern Radioactive Materials Transportation Committee, I am writing to thank you for attending our recent meeting. As you observed in Overland Park, the committee’s discussions regarding the operational aspects of specific shipping campaigns often wind up identifying issues that have broader implications for DOE’s policies and programs. We always appreciate the opportunity to have a representative of DOE Headquarters on hand to participate in these discussions and to take some of the key issues back to Washington for further consideration.

The committee has worked with DOE for 10 years now to address a wide array of policies and programs involving radioactive materials shipments. Our focus for the first five years was the Office of Civilian Radioactive Waste Management (OCRWM). Over the past five years, we have concentrated our work on the National Transportation Program (NTP), the Waste Isolation Pilot Plant (WIPP), the Spent Fuel Program, and — more recently — the West Valley Demonstration Project. Our experiences have led us to make the following observations.

I. **DOE needs a strong, centralized transportation program.**

The NTP does an admirable job with the mission and the resources it has; however, with the proper support, the program could do much more to improve DOE’s transportation activities. We believe the Office of Environmental Management (EM) should approach transportation in the
same manner it does storage and disposal. That is, EM should consolidate its transportation activities to the extent possible in order to realize efficiencies and reduce the duplication of effort.

It would not have made sense, for example, for EM to build facilities for treating, storing, or disposing of similar kinds of waste at several different sites. In the case of the Mound closure project, DOE avoided the expense of constructing a facility specifically to repackage Mound's transuranic waste by shipping the waste to the Savannah River Site, which had a definite need for such a facility.

Likewise, it does not make sense for a shipping program to start planning from scratch without taking advantage of the work that has already been done elsewhere in the department. NTP should be the primary storehouse for DOE's transportation-related expertise and resources (e.g., planning documents, lessons learned, TRANSCOM, the Prospective Shipments Module, etc.). The program could also serve as a clearinghouse for these same resources throughout the department. What the program needs to fulfill this mission is sufficient funding, the right direction, and — most importantly — the full cooperation of all DOE's shipping programs.

We suggested this type of consolidation to Dave Huizenga last year; however, we did not have a chance to thoroughly discuss our ideas with Dave prior to his departure. Perhaps it is a conversation the committee will be able to have with you at some future date.

**II. DOE should pursue consolidated funding.**

The Midwestern region has been a strong advocate of consolidated funding largely because our states have traditionally seen a large number of shipments without receiving a great deal of financial assistance. In Overland Park, you heard the Midwestern states discuss their needs with regard to training. We noted the large percentage of volunteers, the high turnover rates, and the constant need to train and retrain. The Midwestern states regard DOE assistance as a much-needed supplement to existing state programs, each one of which is responsible for training throughout an entire state. Financial assistance from DOE makes it possible for us to concentrate more resources on specific shipping corridors.

We think the concept of consolidated funding is fair and workable. Our own regional cooperative agreement with DOE is, in essence, a form of consolidated funding, with requests for assistance going out to NTP, WIPP, the Spent Fuel Program, West Valley, and — possibly later this year — OCRWM. We hope to see DOE make the decision to move forward with consolidated funding in the near future.
III. DOE should evaluate shipment security measures on a department-wide basis.

In the months since September 11, a new issue has come to the fore — namely, shipment security. We believe it would be prudent for DOE to work with the Nuclear Regulatory Commission and the Department of Transportation to evaluate current practices and requirements regarding the security of radioactive materials shipments. We are concerned that, if DOE Headquarters does not take the lead on this matter for the department, ad hoc approaches to addressing security will crop up. This is already happening to some extent with the Western region examining security measures for WIPP shipments. We urge DOE to initiate discussions between all the pertinent agencies at the federal and state level, utilizing the regional groups as much as possible. We offer whatever assistance we can provide in moving those discussions forward.

Thank you for the opportunity to reiterate some of the key points from the Midwestern committee meeting. We appreciate your taking the time to attend our meeting. We would welcome your participation in future meetings, as your schedule permits.

Please feel free to contact either Lisa Sattler (920-803-9976) or me (217-786-6365) if you have any questions. Thanks again.

Sincerely,

 Timothy A. Runyon, Chief
 Division of Environmental Monitoring,
 Illinois Department of Nuclear Safety, and
 Chair, CSG Midwestern Radioactive Materials
 Transportation Committee

TAR/Irs

cc:   Judith Holm, NTP
      Noelle Kostecki, Chicago Operations Office
      Ralph Smith, Carlsbad Field Office