

The Council of State Governments
Midwestern Radioactive Materials Transportation Committee

Comments on OCRWM's *National Transportation Plan Outline* (draft, dated 2/23/2007)

General Comments: The outline appears to describe a plan for developing the transportation system instead of implementing it. When will OCRWM begin to develop an operations-focused transportation plan, covering activities such as tracking, inspections, and security? These topics are covered under VI.B and C in the National Transportation Plan outline, however they would appear to constitute a small portion of the overall plan.

Whenever OCRWM takes up the development of a transportation operations plan, the program should look to the foreign research reactor spent fuel shipping program and the WIPP program for examples of good plans that are already working. The program should also follow the guidelines established by the DOE *Radioactive Material Transportation Practices Manual*, the *Program Manager's Guide to Transportation Planning*, and regional documents such as the *Midwest's Planning Guide for Shipments of Radioactive Materials Through the Midwestern States*.

The states would find it useful to have a listing of all the transportation-related documents that OCRWM has prepared and what their relationship is to one another. This task was identified as an action item for OCRWM at the TEC/WG meeting in Atlanta. It difficult to understand the link between the transportation plan described in the outline and other program documents, such as the *Transportation Strategic Plan...Guide to Stakeholder Interactions* and the *Transportation System Concept of Operations*.

Specific Comments:

Section	Comment
I.B	According to this statement, the Transportation Plan will present a "strategy for developing a transportation system...." If this document is going to be a strategic plan, why doesn't the title reflect the true purpose of the plan?
III.A.1	The stated purpose of this plan is to "tell the story of how the [transportation] system will be developed and deployed." It would seem that the system is sufficiently "developed" for OCRWM to be telling the story of how waste will get from the power plants to the repository. In other words, it might be useful for the plan to tell the story of how the system will be "deployed" rather than "developed." Perhaps OCRWM will tell the latter story in campaign-specific transportation plans. If that is the case, then the distinction needs to be made clear somewhere in the plan. It is a good idea for this document to stay a "living document" to be updated as decisions are made.

Section	Comment
III.B.4	How does this section differ from IV.B – “policies and requirements that govern the Transportation System” versus “Requirements” under “Situation Assessment?”
III.B.5	“Decisions and resolved issues” should be accompanied by a listing/explanation of decisions that have yet to be made and issues that have yet to be resolved.
IV	This section needs some rearranging. Item G (Standard Contracts dictate the queue) should fall under “Constraints,” as should item D (Multiple waste forms and many sites).
IV.E	Will OCRWM develop separate plans for each different mode of transport?
IV.F	Will the section on Package Selection also address procurement, including the timetable?
V.D.1	We suggest deleting this item. Item 2 will sufficiently explain the process for identifying routes. It would be useful to include an item on defining the concept of “suite of routes,” with the plan itself addressing how OCRWM will implement this concept.
VII.B	The SRGs are not included in the list of parties who have Roles and Responsibilities. The SRGs are included in several DOE transportation plans and should also be included in OCRWM’s plan.
VIII.A	This item should focus on the process for identifying issues, not resolving them. The latter should be a function of VIII.B (Resolution process).
Appendices	The titles of some of these appendix sections makes it appear that OCRWM is putting most of the important details of the transportation operations plan in an appendix. Why is that the case? If OCRWM has a significant amount to say about, e.g., Section 180(c) implementation, then that information should be presented in an actual transportation plan or in its own plan, not in an appendix to a strategic plan. Conversely, if OCRWM does <i>not</i> have a significant amount to say about the topic, then it would seem unnecessary to devote an entire appendix section to it. Why not just cover the topic in the body of the plan? Perhaps these questions would be answered by a clear, concise statement of what this plan will be and how it will connect to other OCRWM program documents.