November 13, 2002

Judith Holm and Dave Zabrasky, Co-Chairs
Transportation External Coordination Working Group (TEC/WG)
U.S. Department of Energy
PO Box 5400
Albuquerque, NM 87185-5400

Dear Judith and Dave:

On behalf of the Midwestern Radioactive Materials Transportation Committee, I am writing to follow up on the discussion in Carlsbad regarding the Department’s Transportation External Coordination Working Group (TEC/WG).

As you are aware, the committee has been a member of the TEC/WG since its inception in April 1992. We have sent one or more regional representatives to every meeting, and our members have served on just about every topic group. Furthermore, our committee and staff have routinely provided very thorough comments on TEC/WG products ranging from the DOE transportation protocols to the TEPP training materials. We have been strong supporters of the TEC/WG in the past, and we hope to continue this tradition well into the future.

We’ve all heard rumors that DOE is planning to dissolve the TEC/WG. If that is the case, I hope the Office of Environmental Management (EM) and the Office of Civilian Radioactive Waste Management (OCRWM) will rethink this decision. The Midwestern states believe the group’s many accomplishments, the multiple functions it serves, and its broad, national scope make the TEC/WG a forum well worth DOE’s continued support.

I. DOE should continue to support the TEC/WG.

The TEC/WG is a unique forum that brings together representatives of federal agencies, states, tribes, local governments, industry, and professional groups. To my knowledge, no other group boasts such a broad diversity in membership or a more balanced field of representation. With so many entities represented, the TEC/WG meetings provide a great
opportunity for the group’s members to review and develop policy, share information, and network. There is great value in having face-to-face interactions between the people actually involved in setting policy and in planning and conducting shipments at all levels — including people in government and the industry. Particularly important for the states, the interactions at the TEC/WG meetings give participants a chance to better understand the perspectives of — and important issues for — the other regions, as well as the State of Nevada. This is important in working together to develop national policy.

In addition to the general sessions, the topic group meetings make it possible for DOE to work with TEC/WG members on specific products. The list of products that have emerged from the topic groups is impressive, including the Modular Emergency Response Radiological Transportation Training (MERRITT), the DOE Transportation Protocols, the Routing Study, the rail matrices, and the WIPP-PIG comparison. We believe these accomplishments demonstrate the enormous strides DOE can make by enlisting the TEC/WG members to develop ideas into valuable, tangible products.

With the Yucca Mountain site recommendation behind us, the OCRWM program will soon begin focusing more attention on transportation issues. The TEC/WG would be an excellent forum for discussing issues of a national scope, such as Section 180(c). As in the past, some of these discussions might be even more fruitful if coupled with cooperative-agreement activities at the regional level to generate feedback and related items for discussion with the TEC/WG at a national level.

Despite our interest in seeing OCRWM become a more prominent participant in the TEC/WG, we believe it is also important for EM to continue to co-sponsor the group and its meetings. OCRWM might, indeed, have responsibility for DOE’s largest shipping campaign involving radioactive waste. Nevertheless, EM is currently conducting shipments of spent fuel and transuranic waste. The precedents that these campaigns set — and the resulting lessons learned — are important topics for the TEC/WG members to consider in their discussions of not only department-wide policies, but also specific aspects of the OCRWM transportation system. EM also has a stake in important topics that the TEC/WG either is addressing or is considering for future activities — for example, rail as a shipping mode, shipment security, and public communications.

II. DOE should consider ways to improve the TEC/WG process and increase its productivity.

Although we strongly support the TEC/WG, we recognize that there might be ways to improve the group’s operation. Toward that end, we offer the following suggestions:

Membership: With input from current members, DOE should re-evaluate the concept of “membership” on the TEC/WG. It is easy to identify who the members are. Less evident, however, is what exactly are the benefits of membership. It seems that all meeting participants are eligible to join the discussion during general sessions, breakout sessions, and topic group meetings. What advantage, if any, members have over non-members is not at all clear. Nor is it clear whether membership should confer any advantages.
Topic Groups: Again, with input from current members, DOE should identify ways to increase participation on topic groups. It seems that the topic groups usually draw their members from the same core group of individuals. Every effort should be made to recruit other members to be active participants on the topic groups. Also, to help complete their work in a timely fashion, the groups should consider identifying milestones early in the process. The topic groups should be encouraged to "sunset" as soon as their mission is accomplished.

Other Groups: DOE should work with the current TEC/WG members to identify other groups that cover some of the same bases as the TEC/WG. If there is overlap between the topics covered by the TEC/WG, the State and Tribal Government Working Group, the National Governors' Association committee, the regional groups, and others, then those areas need to be identified and the reasons for the overlap explained. Any duplication of efforts that cannot be justified should be reduced or even eliminated.

Input into Meetings: DOE should seek more input from TEC/WG members in planning meetings. Having two non-DOE members participate on the planning group does not provide sufficient representation for the large variety of organizations serving on the TEC/WG. Topic group members should also have input into the agendas for their meetings.

Interim Activities: Greater priority should be placed on interim activities, such as conference calls. Also, the TEC/WG website should house all materials that assist the topic groups as they conduct their interim activities.

III. DOE should seek ways to improve meeting logistics and reduce costs.

Two Meetings: DOE should continue to hold two meetings per year, with the winter meeting being smaller and focusing on the topic groups. Both meetings should be limited to two full days, including time for the topic group meetings.

Topic Groups: If necessary to avoid over-committing resources, DOE might consider limiting the number of topic groups to the top two or three issues. (Input from the TEC/WG members would be necessary to help decide which issues should be covered.)

Travel Costs: Although there is a definite need for DOE and contractor staff to attend meetings, some consideration should be given to reducing the number of DOE representatives attending the meetings. DOE should also consider polling the members to see whether it would be possible for some organizations to fund their own travel to the meetings.

Schedule: DOE should consider returning to its original schedule of holding TEC/WG meetings in the third week of January and July. The Martin Luther King, Jr., holiday in January does not seem to be sufficient reason to avoid meeting during that week. (Perhaps a Wednesday-Thursday meeting would accommodate those wishing to avoid traveling on the Monday holiday.)
Regular Destinations: DOE should also consider settling on a handful of regular destinations for meetings, based on ease of access by air travel. Chicago, Atlanta, Denver, and Pittsburgh are a few possibilities for regular meeting locations in each of the four regions. (DOE should still strive to arrange the meetings so as to avoid winter weather.)

Amenities: Although it is nice to stay in hotels such as the Westin and Marriott chains, DOE should consider skipping the great hotels and instead holding the meetings in good hotels, provided they have sufficient business services. Also, DOE should consider eliminating breakfasts and snacks at the meetings, if doing so would reduce meeting costs.

Advance Planning: To make the meetings as productive as possible, DOE must do a better job getting materials out to the meeting participants well in advance. Meeting announcements should go out no later than 60 days prior to the meeting. Briefing materials should be mailed at least three weeks prior to the meeting so that the participants can review them and, if necessary, seek input from their organizations.

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Thank you for the opportunity to weigh in on the TEC/WG. I sincerely hope DOE will hold a winter meeting. Regardless of when the next meeting will be, the Midwestern Radioactive Materials Transportation Committee would be happy to volunteer a representative to serve on the planning committee that develops the agenda.

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

Sincerely,

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