



The Council of
State Governments
**MIDWESTERN
OFFICE**

September 22, 2003

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Dear Dr. Triay:

I am writing about your June 10 letter to Donald Flater with the Iowa Bureau of Radiological Health. Mr. Flater had written to you on May 27 to express his great concern about DOE's use of "placeholder" shipping dates in the eight-week rolling schedule.

In your letter, you assured Mr. Flater that "there will be no changes in the 8-week rolling schedule" unless approved by select individuals, "and then only for reasons beyond a shipping site's control." At the Midwestern Radioactive Materials Transportation Committee meeting in June, Ralph Smith (one of the select individuals) further explained that, if a shipping date were to change after being posted in the eight-week schedule, the shipment would be bumped to the end (i.e., the "ninth week").

In the past two months, the date for the last two debris shipments from Argonne National Laboratory-East (ANL-E) has changed four times on the eight-week schedule. In only one case was the shipment moved to the end of the schedule. It has been my experience that the shipping sites have little control over what gets posted in the schedule. Therefore, I can only conclude that DOE-Carlsbad is once again posting placeholder dates, which is the exact problem Mr. Flater identified in his May letter.

As you know, the states, by agreement, are supposed to use the eight-week schedule as their official notification of the shipping dates. It is exceedingly difficult for the states to schedule the resources necessary for tracking, inspecting, and escorting shipments when the dates are a moving target.

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The states do not want to interfere with ANL-E's ability to make its shipments. Nevertheless, the states *cannot* use the schedule as our official notification until DOE makes a serious commitment to scheduling shipments only when all obstacles have been cleared. For this reason, I am requesting that DOE send a two-week notification letter for all upcoming shipments from ANL-E. Please make sure the letters are directed to the points of contact in Illinois, Iowa, and Nebraska, as well as the Council of State Governments' Midwestern Office. I am also requesting that DOE reconsider the shipping date it has chosen, since Columbus Day is a holiday in many states. I appreciate your assistance.

Please feel free to contact me (217.786.6365) or Lisa Sattler (920.803.9976) if you have any questions. Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy A. Runyon". The signature is fluid and cursive, with the first name being the most prominent.

Timothy A. Runyon
Division of Nuclear Safety,
Illinois Emergency Management Agency, and
Chair, CSG Midwestern Radioactive Materials
Transportation Committee

cc: Don Flater, Iowa
John Erickson, Nebraska
Ralph Smith, DOE/CBFO
Patty Bubar, DOE Headquarters
Kent Hancock, DOE Headquarters