

Response to Comments Received
NTP Fact Sheet: *Transporting DOE Low-Level Radioactive Waste*

<i>Reviewer/Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
DOE Richland Operations Office	2 nd Page, 3 rd Column, 2 nd Paragraph: Not consistent with 49CFR 397.101.	Wording changed to read “radiological risk” instead of “transit time”.
EM-76, DOE HQ	More current data is available for the first paragraph. 1 st Page, 3 rd Column, 2 nd Paragraph, 3 rd Sentence: Delete the word “new”.	First paragraph deleted in response to comment from State of Oregon. The phrasing is consistent with information from DOE LLW program.
DOE Pittsburgh Naval Reactors Office	1 st Page, 3 rd Column, 2 nd Paragraph, 2 nd Sentence: Delete “of waste generated during the Cold War” and “from”. 1 st Page, 3 rd Column, 2 nd Paragraph, Last Sentence: Replace “assist improved treatment methods” with “that ultimately needs to be shipped.” 1 st Page, 3 rd Column, 3 rd Paragraph, 2 nd Sentence: insert “packaging,” before “labeling, preparation of”. 2 nd Page, 1 st Column, 2 nd Paragraph, 1 st Sentence: Change “a key” to “the key”. 2 nd Page, 1 st Column, 3 rd Paragraph, Last Sentence: Change “that meets only minimum design requirements” to “that meets minimum performance requirements.”	Agree. Sentence deleted. Previous sentence rewritten: “Because LLW accounts for a large percentage of DOE’s new waste volume, the Department promotes activities to reduce production of new waste that ultimately must be shipped.” Agree. Disagree. For example, in the recent Fernald incident, characterization and material loading were key issues. Agree.

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DOE/PNR (cont'd.)	<p>2nd Page, 3rd Column, 1st Paragraph, Last Sentence: Change to read: “States may inspect shipments to confirm regulatory compliance.”</p> <p>2nd Page, 3rd Column, Last Paragraph, 2nd Sentence: Delete “spectrometry”.</p>	<p>Agree.</p> <p>Agree.</p>
CT.D.E.P/CRCPD	Fact sheet does not meet his information needs on subject matter.	Designed for a general audience.
Iowa Department of Public Health	Not much if any about States. Especially concerned about notification. Need to point out. May be able to use CRCPD as focal point.	No notification required for low-level waste.
Contractor Traffic Managers Association	<p>1st Page, Photos: Boxes in photographs should show labels affixed “on point.”</p> <p>2nd Page, 3rd Paragraph: While the statement is technically correct concerning excepted packaging meets only minimum design requirements, would it be better to stress that excepted packages must meet general design requirements specified by USDOT and are only used under conditions which can demonstrate the radioactive material being shipped meets very stringent, low levels of activity and contamination that present no risk to the public or the environment?</p> <p>2nd Page, 4th Paragraph: Suggest the wording be changed from “transfers and inventories of LLW” to “shipments of LLW be documented...”</p>	<p>Photo replaced.</p> <p>Added statement referencing conditions for use of excepted packagings and low risk factor.</p> <p>Agree.</p>
DOE/NV	1 st Paragraph: See fact sheet “Shipping Activity.” The figures at a minimum are vague – at a maximum, seem to conflict! We should use one set of figures and be uniform in all fact sheets.	First paragraph deleted.

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DOE/NV (cont'd.)	<p>2nd Page, 1st Paragraph: Delete “all applicable” from last sentence. You may want to include a reference to Waste Acceptance Criteria (WAC).</p> <p>2nd Page, 2nd Paragraph: Next to last sentence is misleading, especially after statement on 1st Page, 3rd Column that describes LLW – certainly not a “solid” as thought of by the public.</p> <p>2nd Page, 3rd Column, 1st Paragraph, 2nd Sentence: DOE <u>doesn't inspect every</u> shipment. Possibly DOE contractors do, but not DOE.</p> <p>2nd Page, 3rd Column, 2nd Paragraph: Reference 49 CFR 397.101(a)(1)(2)(3). (1) is most important; (2) and (3) support (1). Must be changed.</p> <p>2nd Page, 3rd Column, 4th Paragraph, Last Sentence: Is TEPP still current? I thought name was changed.</p>	<p>Wording was changed to “In addition, DOE LLW shipments must comply with all internal DOE requirements.” Don't believe it is necessary to address WAC at this time.</p> <p>Inserted the words “free of liquid”.</p> <p>Paragraph rewritten in response to other similar comments received.</p> <p>Agree. Changed to “radiological risk” instead of “transit time”.</p> <p>Have not received notification from HQ of a name change.</p>
State of Colorado	The map on the second page shows “DynCorp” listed in Colorado. By that, do you mean Rocky Flats? DynCorp was a former contractor at Rocky Flats. Its contract ended on 9/30/98.	Correction made to map.
IAFC	General: No mention of one of the main problems with LLW is that it can be tracked around. Mention the need to establish scene control.	Believe this is unnecessary detail for this level of information.
DOE/NV Contractor	Title: Delete “s” after “DOE”; same applies to top of left and right columns of second page .	Agree.

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DOE/NV Contractor (cont'd.)	<p>1st Page, Photo and 2nd Column, 2nd Sentence: Picture does not depict majority of “large quantity” shipments by truckload. These (in photo) are small air shipments!</p> <p>1st Page, 3rd Column, 2nd Paragraph, Last Sentence: Insert “with” before “improved treatment methods.”</p> <p>1st Page, Last Paragraph: Delete “The” at beginning of first sentence and in middle of second sentence.</p> <p>2nd Page, 3rd Paragraph: Delete “the” following “Selection of”.</p> <p>In the same sentence, insert comma after “Waste” and “radioactivity”.</p> <p>2nd Page, 2nd Column, 3rd Paragraph, 1st Sentence: Delete first word, “A”. Change “package’s markings” to Package markings”.</p> <p>In the same sentence, insert “material” before “identification number”.</p> <p>In the 2nd sentence, insert “for radioactive material” after “Labels”; insert “are” before “placed”; and insert “and” before “identify its contents”.</p> <p>2nd Page, 1st Paragraph: Same comment as DOE/NV about DOE inspections.</p> <p>2nd Page, 2nd Paragraph: Insert “and radiological risk” at end of sentence.</p>	<p>Used new photograph.</p> <p>Sentence was deleted in response to other comments.</p> <p>Agree.</p> <p>Agree.</p> <p>Disagree. Commas not needed for clarity.</p> <p>Agree.</p> <p>Agree.</p> <p>Agree.</p> <p>Same response as to DOE/NV comment.</p> <p>Wording changed to “radiological risk” instead of “transit time”.</p>

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DOE/NV Contractor (cont'd.)	<p>2nd Page, 3rd Paragraph, Last Sentence: Add “for all hazmat employees” to end of line.</p> <p>2nd Page, 4th Paragraph: Same comment about TEPP as DOE/NV.</p> <p>2nd Page, Last Paragraph, Last Sentence: Insert “appropriate DOE” before “program is also available”.</p> <p>General: General audience would not know “transuranic.” Need to explain radiation levels. Perhaps say “Transuranic waste contains man-made elements heavier than uranium and can take thousands of years to decay (disintegrate).”</p>	<p>Do not believe additional wording necessary.</p> <p>Same response as to DOE/NV comment.</p> <p>Done.</p> <p>Agree.</p>
State of Oregon State of Oregon (cont'd.)	<p>1st Page, 1st Paragraph: Attempts to minimize DOE’s transportation activities. I strongly recommend deleting this.</p> <p>1st Page, 2nd Column, 1st Sentence: The Federal definition of LLW does not make any sense to a general reader (or many others, for that matter).</p> <p>1st Page, 3rd Column, 2nd Paragraph, Last 2 sentences: Suggest rewriting last phrase in each sentence to make them a little more substantive.</p> <p>1st Page, 3rd Column, Last Line: Add mention of driver standards.</p> <p>2nd Page, 1st Paragraph, Last Line: Will a general reader understand the term “DOE Orders”?</p> <p>2nd Page; 3rd Column, 5th Paragraph: Will a general reader</p>	<p>First paragraph deleted.</p> <p>Definition expanded..</p> <p>Next to last sentence was reworded. Last sentence was deleted (reference response to above comment by DOE/PNR).</p> <p>Expanded coverage to include personnel and conveyance performance and maintenance standards.</p> <p>Changed to read “internal DOE requirements.”</p> <p>Word deleted.</p>

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	<p>understand the word “spectrometry”?</p> <p>2nd Page, Map: Mention of “single” shipments makes it sound like one individual truckload. Arrows, key, are confusing. I would suggest simplifying.</p>	<p>Deleted “15 single” from caption.</p> <p>Graphic is meant to show relative weights. Tonnage implies shipment volume.</p>
State of Washington	<p>Last Page: There is a section that references “Inspections.” It reads: “States may inspect shipments at State borders, at weigh stations, and along the roadside to enforce regulations.” For Washington and other States, inspections not only may but must be done on site before the shipment even leaves the premises.</p>	<p>Section has been reworded.</p>
Council of State Governments, Mid-West	<p>2nd Page, Map: If the map shows the single largest shipments, then it might be more informative for the reader if the actual routes were identified (i.e., rather than simply having lines with arrows).</p>	<p>Meant only to show origin/destination points. Scale of map not conducive to identifying routes.</p>
State of New Mexico	<p>1st Page, 3rd Column, 2nd Paragraph, Last Sentence: “These activities reduce the total amount of waste produced and <u>assist improved treatment methods.</u>” What does underlined text mean?</p>	<p>Reworded for clarification. See above response to similar comment by DOE/PNR.</p>
Western Governors’ Association	<p>General: May want to reference “Waste Management Programmatic EIS” as a primary source of additional information and how to obtain it.</p>	<p>Agree.</p>

NOTES:

- “No Comment” responses received from: Indiana SEMA, ATR Institute, (UNM), Association of American Railroads, NV State Rail Safety Program Managers, Texas State Energy Conservation Office/Pantex Program.