

Response to Comments Received
NTP Fact Sheet: *Spent Nuclear Fuel and High-Level Radioactive Waste Transportation*

<i>Reviewer/Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
ATR Institute, UNM	1 st Pg., 2 nd Column: “DOE no longer reprocesses spent fuel.” The general audience would respond, “Why not? Recycling is good in general, etc.” Adding a sentence to state why DOE does not reprocess might help people understand the situation.	Phrase added to beginning of sentence: “Because separated highly enriched uranium could be used in nuclear weapons and because the United States has established a policy to eliminate the proliferation of weapons grade materials...”
DOE Richland Operations Office	<p>1st Page, 1st Paragraph: Cs & St capsules are not spent fuel or high-level waste.</p> <p>1st Page, 3rd Column, 2nd Paragraph: What about foreign reactor fuel. Will the Department accept naval warships’ material.</p> <p>General: Does not state the Acceptance Criteria.</p> <p>3rd Page, Graphic: Not all the tests stated.</p> <p>Need to emphasize that after each test the cask is leakage tested to (comment illegible).</p>	<p>True. Fact sheet addresses SNF/HLW, not other HRCQ.</p> <p>Included foreign fuel in fact sheet. Only U.S. Navy warship material.</p> <p>Don’t believe that level of detail is necessary here. Focuses on transportation not acceptance.</p> <p>Done in the Package Performance fact sheet.</p> <p>Comment illegible.</p>
EM-76, DOE-HQ	<p>1st Sentence: DOE “ships”.... Shippers ship and carriers transport.</p> <p>2nd Page, 1st Paragraph: This is not the only process that generates high-level waste.</p> <p>2nd Page, 3rd Column, 2nd Paragraph, 2nd Sentence: Replace “transporting” with “the transportation of”.</p>	<p>Changed “transports” to “ships”.</p> <p>Added text.</p> <p>Done.</p>

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EM-76 (cont'd.)	3 rd Page, 3 rd Paragraph: Add “and did not release its contents” to end of last sentence.	Paragraph deleted in response to other comments.
DOE Pittsburgh Naval Reactors Office	<p>1st Page, 2nd Column, 7th Line: Change “United States and was” to “United States which was”.</p> <p>1st Page, 3rd Column, 2nd Paragraph, Last Sentence: Insert “commercial” before “spent fuel assemblies”.</p> <p>3rd Page, 3rd Paragraph, Last Line: Change “damaged only slightly” to “only slightly damaged.”</p> <p>3rd Page, Graphic Caption: Replace “tests” with “performance requirements” in the first sentence. In the second sentence, replace “test” with “these”. In the last sentence, replace “tests are conducted” with “performance requirements are required”.</p> <p>3rd Page, Graphic Text, Number 2: In the second paragraph, delete “test”.</p> <p>3rd Page, Graphic Text, Number 4, Footnote: Replace “that any impact” with “that damaging energy created by the impact”.</p> <p>4th Page, 2nd Paragraph: Rewrite first sentence to say “Routes for rail shipments are selected based on safety, best available trackage, schedule efficiency, and cost effectiveness.”</p>	<p>Agree.</p> <p>Wording modified.</p> <p>Paragraph deleted.</p> <p>Paragraph deleted from caption.</p> <p>Reworded to delete “test”.</p> <p>Agree. Graphic replaced to be consistent with Package Performance fact sheet; wording will be changed in both fact sheets for next revision.</p> <p>Sentence modified to include best available trackage and schedule efficiency. Cost-effectiveness is not a safety issue.</p>
Iowa Department of Public Health	Depending on audience needs, more info. on how DOE is working with States. People don’t necessarily trust Feds. May lessen some concerns by showing joint effort.	Agree.

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DOE Nevada Opns. Office	<p>3rd Page, 4th Paragraph: DOT regulations don't help, they demand strict compliance to minimize radiological risk during transportation.</p> <p>Delete next sentence completely.</p> <p>Last Page, Next to Last Paragraph: Combine last two sentences.</p> <p>Last Page, 2nd Paragraph: Railroads used for shipments because it reduces risk, increases safety.</p>	<p>Reworded.</p> <p>Disagree. 49 CFR 397.101(b)(2) states that carriers of HRCQ shipments "select routes to reduce time in transit". This fact sheet and this paragraph in particular are addressing spent fuel and HLW shipments.</p> <p>Agree.</p> <p>Added increased safety concept.</p>
IAFC	<p>General: There has always been a belief that spent fuel rods could cause an atomic bomb type explosion. If this is not the case, state this.</p>	<p>Do not believe that level of detail not necessary in this fact sheet.</p>
DOE NV Contractor	<p>Pictures on pages 2 & 4 not clear, need arrows to indicate what it is.</p> <p>1st Page, 3rd Column, 2nd Paragraph: Delete "spent fuel".</p> <p>Last Page, Caption: Insert "placarding" after "marking".</p> <p>Last Page, Summary: Delete first part of last sentence. Begin sentence with "No injuries". Change "these shipments" to "DOE shipments."</p>	<p>Final printed copies will be of better quality.</p> <p>Agree.</p> <p>Done.</p> <p>Agree.</p>
State of Oregon	<p>General: Text through much of the first two pages is a little choppy – doesn't flow smoothly.</p> <p>Don't use acronyms in captions.</p>	<p>Much of text on first two pages rewritten to accommodate comments.</p> <p>Space restrictions necessitate use of acronyms in some cases. All acronyms are spelled out in text of fact sheet.</p>

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Oregon (cont'd.)	<p>1st Page, 3rd Column, 2nd Line: Delete apostrophe from date.</p> <p>3rd Page, Graphic: Add clarifying language to indicate that this is the sequence of testing when physical testing is conducted.</p>	<p>Placement of apostrophe is in conformance with <i>GPO Style Manual</i>.</p> <p>Wording is consistent with that used in Package Performance fact sheet. “Physical Testing” added to graphic title.</p>
Pantex Program	<p>1st Page, 1st Paragraph: While reference in the first section to nonproliferation initiatives in the context of explaining U.S. policy to cease reprocessing of spent fuel may be necessary, mention of atoms for peace programs and foreign use of U.S. uranium enriched fuel may raise questions beyond the scope of this fact sheet.</p> <p>2nd Page, 1st Paragraph, 3rd Sentence: The following change should be considered: Insert “currently” between “does not” and “reprocess spent fuel”.</p> <p>2nd Page, 3rd Column, 1st Paragraph: Consider changing last sentence to read “Some high-level waste is being immobilized in glass logs...”</p>	<p>Disagree. Policy and Program are part of history.</p> <p>Agree.</p> <p>Agree.</p>
Council of State Governments, Mid-West	<p>1st Page, 2nd Column, Last Sentence: Perhaps replace “These spent fuel rods” with simply “This spent fuel”?</p> <p>1st Page, 3rd Column: Under <u>What Is Spent Fuel?</u>, either remove “domestic” from before “research reactors” or insert “foreign and” before “domestic.”</p> <p>2nd Page, 3rd Column: Under <u>Why Are Spent Fuel and HLW Shipped?</u>, insert “and high-level radioactive waste” after “spent fuel” in the 2nd sentence (because of the reference to “defense-related HLW sites”).</p>	<p>Agree.</p> <p>Agree.</p> <p>Agree.</p>

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State of New Mexico	<p>1st Page, Graphic: Explain <u>what</u> TRIGA is, not just what acronym stands for.</p> <p>1st Page, 1st Paragraph: I don't think statement that DOE doesn't reprocess SNF is accurate.</p>	<p>TRIGA has been identified as research reactor fuel.</p> <p>Not reprocessing now.</p>
Western Governors' Association	<p>1st Page, 2nd Column, 1st Line: The fact sheet states "DOE no longer reprocesses spent fuel." It is my understanding that Savannah River was doing some reprocessing as recently as a year or 2 ago. Has this stopped permanently?</p> <p>1st Page, 3rd Column, 2nd Paragraph: States "assemblies must be removed from the reactor for storage." Include reason why: "to make room for the new assemblies and to allow fuel to cool."</p> <p>2nd Page, 3rd Column, 2nd Paragraph: Additional information is needed to address reasons behind transport of Naval spent fuel, special case commercial spent fuel, and domestic non-DOE spent fuel – if this fuel is/will be transported.</p> <p>2nd Page, 3rd Column, Last Paragraph: Mention "Type B" container; that Type B is the most robust form of packaging under Federal regulations, and cite the applicable Federal regulations.</p> <p>3rd Page, 2nd Paragraph: It is important to mention the important role that the carrier/driver plays in transport safety; and how DOE imposes/will impose stringent requirements for selection/performance of the carrier/drivers through contract provision. Also, there is</p>	<p>Not reprocessing now.</p> <p>Agree.</p> <p>Agree. Text added.</p> <p>Added text to address Type B packaging. Regulations cited elsewhere in fact sheet.</p> <p>Wording modified. Text added.</p>

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WGA (cont'd.)	no mention of the important role State and Tribes have in transport safety, especially in program planning and implementation (e.g., inspections). DOE should note how it “consults and coordinates” (on transport safety plans) with affected States and Tribes. Finally, the product should mention the “Advance Notification” requirements under Federal law and DOE’s internal policy on tracking of shipments (TRANSCOM).	

NOTE:

- “No Comment” responses received from: Indiana SEMA, Connecticut DEP/CRCPD, Association of American Railroads, Nevada State Rail Safety Program Managers, and Contractor Traffic Managers Association.