

WIPP WORKING GROUP

Handwritten scribbles

Meeting of December 5, 2000
(8:30 a.m. – 10:00 a.m.)
EMNRD Conference Room
2040 S. Pacheco Street
Santa Fe, NM 87505

AGENDA

1. Introductions
2. Review of November 2000 Minutes
3. Fiscal/Administrative Business
 - WIPP Transportation Incident
 - Update on Meeting with John VandeKraats
 - WGA Topic Review - PIG
 - WIPP Transportation Program Evaluation Survey
 - Medical Training Survey Results – T. Yackey
 - NMED Update – Steve Zappe
4. Training
 - Training Data Base Development
5. WIPP Safe Transportation Program: Issues, Activities, and Updates
 - Bobby Lopez -- NMED
 - Tim Yackey -- DOH
 - John Shea -- TESD/DPS
 - Capt. Juan Ontiveros -- NMSP/DPS
 - Gary Trujillo -- MTD/DPS
 - Todd Wilson -- SH&TD
 - Mike Slusher -- SFM
6. Other Items
 - Scheduling of Next Working Group Meeting - January 9, 2000

Handwritten notes:
WIPP
Medical Training
BCC
Para 1 mod 5/1/00

001205



Mackie, Bill

From: Vandekraats, John - DOE[SMTP:Vandek]@wipp.carlsbad.nm.us]
Sent: Friday, December 01, 2000 2:15 PM
To: 'Bill Mackie'; 'Juan Ontiveros'; 'John Shea'
Subject: Follow-Up on November 8 Meeting

Gentlemen:

This is my follow-up to our meeting about a month ago. I think that most of the issues that were brought up are solved. However, I continue to work on some of them and ask for your continued patience and invite your input. I'll list what I have and the current disposition. If I've missed something or need further clarification please advise.

1. Look at turning TRANSCOM on for empties (Shea): It looks like we can do this when there are loaded shipments on the road. If there is no actively tracked shipment on the road, it will be an unplanned, unbudgeted expense that I believe is unreasonable. If we turn TRANSCOM on for empties there is no intent to do anything more (no communications or data entry via TRANSCOM).
2. Look at listing alternate routes for empties on the 8-wk rolling schedule (suggested listing Alternate Route A, B, C etc.) (Shea): This one is not yet resolved. My concern expressed at the meeting remains. What will be the impact in the future when there are shipments passing through many, many states.
3. Are TRANSCOM Bills of Lading Complete? (Ontiveros): In sampling past shipments we could find no occurrence where the Bill of Lading was incomplete. In reflecting on the question that was posed, it may be that the form just doesn't provide all the information that NM would like to see.
4. CAST and Tri-State transportation plans to Mackie (Mackie): Done:
5. Tri-State contact telephone numbers to NM (Mackie/Shea): Done.
6. Add Shea's personal email to 8-wk rolling schedule distribution (Shea): Done.
7. Look at putting ETA of state's Ports of Entry on 8-wk schedule and/or determine how we can warn states when the truck is ahead or behind schedule [1-2 window] when the two hour notification is made (Trujillo): Not done, still looking for input on this. I have not yet identified a clean, low impact way to accomplish this.
8. Suggest informal emails for activities that may affect the 8-wk rolling schedule (e.g. delay at departure) followed by formal revision when the schedule is set. (VandeKraats): Done. Westinghouse Shipping Coordination group sends advisory emails to the same distribution as the 8-week rolling schedule. Still needs some improvement.
9. Make calls/informal notifications when a shipment is delayed and when a delayed shipment finally is dispatched (VandeKraats): Done. CMR makes these calls now.

If you have any questions or comments, please call or email me. Thanks.

John VandeKraats
DOE-CBFO

Date: December 5, 2000

To: WGA WIPP Technical Advisory Group

From: Ken Niles

Subject: WGA Program Evaluation

Since we began the current program evaluation at my suggestion, I thought the least I could do is summarize the results for everyone. Nathan provided me with my copies a day early so that I could do this. I do encourage each of the lead states to go through each of the state's responses for their respective topics.

Overall, I am very pleased with the information we have compiled. We received responses from six of the seven states which have experienced shipments.

I have found a few questions in here which need to be reworded or deleted, but for the most part, I believe this survey worked well. What I suggest each of the lead states do is look to see what questions were NOT asked. What information are we missing that we should have collected?

Here's a quick summary of the results of the evaluation. We obviously will discuss this in greater detail in Las Vegas in two weeks. A few of the issues will need to be addressed over the coming months.

High Quality Drivers and Carrier Compliance

- Four of the six states receive the audit summaries. New Mexico and Washington apparently do not.
- For those states who have received and reviewed the audit summaries, we found they contained sufficient information and had no suggestions for additional information to be gathered.
- Four states believe the frequency of the audits is sufficient. Colorado suggests that CAST could be audited twice a year instead of quarterly.

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Independent Inspections

- All six states responding conduct or plan to conduct enhanced CVSA inspections. Wyoming is the only one of the six which plans to inspect just a sampling. The others so far plan to inspect all WIPP shipments through their states.
- Only Colorado and New Mexico are required to inspect the shipments by state statute or agreement (Oregon must for any HRCQ). The rest of the states have chosen to conduct the inspections.
- Wyoming and Colorado need more inspectors.
- All states have received sufficient CVSA training.
- For the most part, pre-shipment notification has been sufficient to schedule inspectors. It has been a problem in some cases, including in Colorado, Idaho and New Mexico. Colorado has experienced problems primarily with shipments originating in other states.
- Only three of the states receive the CVSA reports. The others don't know what report this is (and frankly I'm one of them).
- None of the states have identified problems with the inspection program.

Bad Weather & Road Conditions

- All states have been checking road and weather conditions and passing that information on to DOE.
- New Mexico is the only state which disagreed with a DOE decision to dispatch shipments because of road or weather conditions. New Mexico has also encountered problems with empty and road show shipments running into bad weather because they aren't tracked and the CMR doesn't check with the state prior to dispatch.

Safe Parking

- Three states have had shipments seek a safe parking location in their states – Colorado, New Mexico and Wyoming.
- None of these states indicated any problem with the truck parking at an unacceptable location and their procedures were followed.
- Colorado says the time it took to get permission to park at the Pueblo Army Depot caused a significant delay, and that this issue has not yet been resolved.

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- Oregon indicates that the Umatilla Tribe has concerns about using the one DOD facility in Oregon, the Umatilla Army Depot.

Advance Notice & Shipment Tracking

- All states seem to be pleased with the schedule information provided to us by DOE, however, there is concern about the schedules continually changing – sometimes several times in one day.
- All states pass shipment information along to various other state and local government agencies.
- All states are so far tracking every WIPP shipment through their state.
- All states have had repeated problems with TRANSCOM.
- Two states report having received telephone notification when TRANSCOM crashed and a shipment was in or near their state. New Mexico says they have never received telephone notification and are usually the party to initiate contact after a problem occurs.
- Colorado expressed concern about whether Tri-State's management plan recognizes the Program Implementation Guide or proper backup procedures.

Medical Preparedness

- Hospital training has generally been available as needed.
- Colorado, New Mexico, Idaho and Wyoming anticipate needing up to 27 hospital classes in the next year.
- Several states expressed concern about the hospitals tacking advantage of the available training.

Mutual Aid Agreements

- For the most part, every state is satisfied with the mutual aid agreements which they have.
- Wyoming would like an agreement with neighboring states, but has to resolve issues related to workers compensation and liability.
- All states have been diligent about updating contact information.

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- Exercises and real events which have tested the mutual aid agreements have shown good results.

Emergency Response Plans and Procedures

- All states have response plans and procedures in place and all have been reviewed or updated in the past year.
- Tests of the plans and procedures through exercises have shown little need for changes.

Equipment

- All states have a schedule for maintaining and calibrating their equipment. All states have met those schedules.
- Colorado expressed strong concerns about the lack of an instrumentation course through WIPP.
- As far as additional equipment needs, Colorado lists lighting for their port-of-entry, Wyoming lists field analysis capabilities, and Washington could use up to six more survey meters and 12 pair of binoculars. Idaho mentioned that equipment replacement will need to be considered in the near future.

Emergency Training & Exercises

- All states provide WIPP specific training. Three states – Colorado, Idaho and Wyoming – use STEP trainers to do some or all of their training.
- Colorado and Wyoming will request STEP training within the next year.
- We've met most of our training goals.
- Feedback on the training – either written or verbal – has generally been very favorable.
- Five of the six states plan WIPP specific exercises next year. Most will expect some help from DOE – including trucks and drivers, public information materials, exercise planning, and responder training.

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Public Information

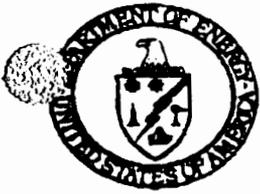
- All the states had sufficient public information materials available to meet their needs.
- Additional assistance is anticipated by some states in 2001, including risk communication training.
- Comments at public meetings were generally favorable about the transportation program, although there was concerns expressed by some.
- We've all seen news media coverage on WIPP and WIPP shipments in our states. Generally the coverage has been fair.
- Four states requested public information assistance from DOE-Carlsbad or their contractors, including WIPP rocks, flyers, site tours and other public information materials. All four states were happy with the response they received to their requests.

Routing

- No states had a WIPP shipment deviate from the route (the incident with Tri-State occurred after the survey forms were filled out).

Again, this is not meant in any way to be a definitive analysis of the results from these survey forms. This is just a quick summary. I encourage all states to review these surveys, and especially focus on those areas in which you are the lead states.

I'll see you all in Las Vegas.



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
November 15, 2000

NOV 21 2000

Mr. William Mackie
New Mexico Energy, Minerals, and Natural Resources Department
2040 Pacheco Street
Santa Fe NM, 87505

Dear Mr. Mackie:

Enclosed is a copy of the National Research Council Waste Isolation Pilot Plant Interim Report. Page 22 of the Interim Report includes the Council's Finding, Recommendation, and Rationale for the generation and maintenance of emergency preparedness information for emergency response agencies and other entities along the WIPP routes.

In response to the Recommendation, we are soliciting your advice and opinions about the most effective way to generate and maintain the spatial information. We must also determine who should take action to correct the deficiency.

Information to produce this database must come from the states, tribes, counties, cities, and towns. The Carlsbad Field Office believes it is appropriate to request your input prior to taking any unilateral action in gathering information from your member states or their units of local government. We would also appreciate any guidance you may have on the frequency of gathering this information and your opinion on the value of this type of a program.

Please provide a consolidated recommendation from the Western Governors' Association member states directly to Mr. E. Ralph Smith. Thank you for your assistance in keeping our transportation corridors as safe as possible.

Sincerely,

Mr. Kerry W. Watson
Assistant Manager
Office of National TRU Program

cc:
R. Nelson, CBFO
R. Smith, CBFO
D. Hurtt, CBFO
R. Walker, WID
O.W. Eaton, WID
W. Prather-Stroud, WID

essed prior to posting. These data acquisition and processing activities appear to introduce time delays that limit system performance; for example, position updates showing the locations of trucks along routes are delayed by several (up to seven) minutes (Nelson, 1999b). An as-yet-unspecified element of these planned upgrades is the extent to which future stakeholder participation will be solicited and used to provide sufficient feedback to ensure that the product ultimately developed addresses user concerns. Moreover, the timetable for off-the-shelf availability of TRANSCOM 2000 appears to the committee to be several years in the future, a problematic scenario for a WIPP shipping activity that is already underway.

One issue relevant to these planned information disclosures in TRANSCOM 2000 is the extent to which such information is needed or useful, by which parties, and to what ends. For example, the terrorist hazard and/or the potential for deliberate sabotage would presumably increase as this information is disseminated more broadly. If restricted access to certain information were important, security firewalls could be used to prevent internet information from being accessed outside of the TRANSCOM user community.

At present, the National TRU Program is one of many DOE users of the TRANSCOM system that is managed by another DOE program unit, the DOE transportation center in Albuquerque, New Mexico; other DOE transportation users include shippers of low-level waste and spent nuclear fuel. If the DOE transportation program that maintains TRANSCOM cannot provide sufficient improvements to fully implement the above recommendations, another approach would be for the National TRU Program to adapt a commercially available tracking system for use on WIPP shipments only. If the tracking system need only meet WIPP shipment requirements, the system specifications would likely be simpler, with a correspondingly greater likelihood that a commercially available product could be adapted for use. For example, WIPP shipments involve unclassified material, which may allow relief from the full suite of TRANSCOM system requirements that have been developed for all of DOE shipping needs.

DOE's Emergency Response Program

Finding: The responsibility for emergency response is divided between DOE and the states along WIPP shipment corridors. In the committee's view, a system to maintain up-to-date information on response capability would contribute significantly to the effectiveness of the transportation system. The WIPP emergency response program has not assessed sufficiently whether adequate and timely emergency response coverage for a transportation incident exists along the full extent of each WIPP route. No formal system presently exists to identify areas where coverage may be inadequate.

Recommendations: The committee recommends that DOE explore with states and other interested parties how to develop processes and tools for maintaining up-to-date spatial information on the location, capabilities, and contact information of responders, medical facilities, re-

covery equipment, regional response teams, and other resources that might be needed to respond to a WIPP transportation incident. This assessment should explore which organization(s) should develop and maintain the capability to generate and maintain such information. DOE should also determine where emergency response capability is currently lacking, identify organization(s) responsible for addressing these deficiencies, and take action to address them.

Rationale: To respond appropriately to any accident or other incident associated with a WIPP shipment, an emergency response system has been developed involving the DOE and state and local governments. Four levels of emergency response teams have been established. The first responders, typically the local police or local fire department, are to alert others. Their "911" call routes the incident to the attention of the second responders, the state emergency management agency, which then involves the state police and any state hazardous material (HAZMAT) or radiological response teams. The third responders are DOE Radiological Assistance Program teams that would be sent from major DOE sites (e.g., Idaho Engineering and Environmental Laboratory or the DOE Carlsbad Area Office) to conduct radiological emergency (medical) response. The fourth level of response is DOE remediation teams who perform measures such as righting a truck and any necessary site cleanup and restoration activities (DOE, 1998a).

Because of the required integrity of the TRUPACT-II shipping container, which is tested and certified to conform to the USNRC's 10 CFR 71 regulatory requirements, the containment offered by this container normally cannot be breached in an accident scenario. Therefore, emergency response procedures in these four levels of response normally would preclude any consideration of releases of materials from the TRUPACT-II. Under normal conditions, the emergency response procedures would still be needed for traffic management and other necessary operations in accident-related situations.

DOE's emergency response program relies heavily on WIPP corridor states to conduct emergency responder training and develop response plans in the event of a transportation incident. DOE also maintains its own specialized response capabilities that can be deployed on an as-needed basis. Although this approach offers certain advantages in terms of state and local involvement, system-level integration is a significant concern.

Maintaining an effective emergency response program necessitates that, if an incident should occur anywhere along a WIPP route, qualified responders can reach the scene in a timely fashion. Emergency preparedness is a formidable challenge given the thousands of miles of highway that comprise WIPP routes.

While WIPP corridor states are coordinating with DOE to ensure the safe transport of WIPP shipments¹⁸ (DOE, 1995, 1999b; Klaus, 1999; Ross, 1999; Wentz, 1999), the public may view this responsibility as ulti-

¹⁸These activities have included training drills that have been conducted over the past several years to simulate real transportation procedures and accident scenarios.

ately resting with DOE as the system manager. The public might well expect qualified emergency response coverage along the entire length of each WIPP route, and in the committee's view, DOE could be heavily criticized if an event occurs that demonstrates weaknesses in the emergency response program, regardless of whether serious consequences are involved. Hence, although the recommendations in this section are not legal requirements, these assessments of the emergency response capabilities are, in the committee's view, important for providing a well-orchestrated transportation system.

The system-level integration necessary to ensure adequate emergency response would have to manage the jurisdictional boundaries between the various responsible government agencies. For example, under the federal Occupational Safety and Health Act (specifically, 29 CFR 1910.120), an employer is responsible for providing training; consequently, the state has the responsibility to determine the extent and adequacy of training (i.e., who is trained and in what capabilities) for first- and second-level responders. States have, to date, offered free WIPP-related training opportunities. No "quality assurance" program yet exists to evaluate periodically and systematically the extent of training and response capabilities within states. Moreover, the database lists trained personnel by state only, rather than by local region (e.g., county). As required by the Land Withdrawal Act, DOE provides the states with WIPP-specific hazard information, but DOE does not furnish protective, detection, monitoring, or communication equipment to states.

These and other demarcations of responsibilities should be managed to ensure that prompt and effective response capability for any transportation incident exists anywhere along a WIPP route. Although the training and response time associated with the first and second responders are not under DOE's direct control, a system to assess the extent and adequacy of this response coverage would be useful for DOE to properly prepare for and manage WIPP transportation incidents.

Committee Perspective on National TRU Program Requirements

A reasonable goal for the National TRU Program is to send DOE TRU waste to WIPP at a minimum risk (from all sources of risk, including radiological exposure and highway accidents) and cost. The current system for managing TRU wastes does not achieve this goal. The current transportation system cannot be used to ship a large fraction of the TRU waste volume without significant repackaging (Connolly and Kosiewicz, 1997; DOE, 1999b; Mroz et al., 1997). For the waste inventory that does qualify for shipment in this system, risk and cost considerations have not been optimized.

The terms and activities selected by DOE Carlsbad Area Office for submission to its regulatory authorities to satisfy applicable regulations and other concerns do not produce an optimum balance between risk and cost, in the spirit of ALARA. The committee recommends that waste management procedures be reviewed and revised, with reduction of risk and cost as the guiding principles.