



Department of Energy

Washington, DC 20585

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71-9264

JUL 17 1996

Dr. William D. Travers, Director
Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Dr. Travers:

The Department of Energy (DOE) published a request for expression of interest and comments in the May 28, 1996, Federal Register Notice as part of DOE's on-going efforts to develop a plan for the performance of its waste acceptance, storage, and transportation responsibilities. Fifty-one parties provided comments in response to this request. A copy of these comments is enclosed for your information as promised during the July 1, 1996, management meeting between DOE and the U.S. Nuclear Regulatory Commission.

A pre-solicitation conference held at DOE on July 9, 1996, was attended by 89 persons representing 68 organizations. Most attendees were representative of various equipment and service vendor organizations and utilities or utility interest groups, as well as limited representation from other stakeholder and special interest groups. The comment period resulting from this conference will close July 23, 1996. The draft request for proposal is scheduled for issue in October of this year.

If you require any additional information, please contact Dave Zabransky at (202) 586-9198.

Sincerely,

Ronald A. Milner, Director
Office of Program Management
and Integration
Office of Civilian Radioactive
Waste Management

Enclosure

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Change: G. Thayer
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cc:

R. Loux, State of Nevada
R. Price, NV Legislative Committee, NV
J. Meder, NV Legislative Counsel Bureau, NV
M. Murphy, Nye County, NV
D. Bechtel, Clark County, NV
P. Niedzielski-Eichner, Nye County, NV
B. Mettam, Inyo County, CA
V. Poe, Mineral County, NV
F. Mariani, White Pine County, NV
H. Estes, Lander County, NV
S. Green, Eureka County, NV
J. Hoffman, Esmeralda County, NV
J. Regan, Churchill County, NV
L. Bradshaw, Nye County, NV
J. Pitts, Lincoln County, NV
W. Barnard, NWTRB, Washington, DC
T. Burton, NV Indian Environmental Coalition, NV
R. Holden, National Congress of American Indians
M. Federline, NRC
J. Austin, NRC

sp ID	Sender	Organization	Commentor
0001	ROGER T. ROBERSON	ENVIRO. TRANSP. INC.	Company
0002	R. M. Grube	Yankee Atomic Elec.	Utility
0003	EDWARD E. ERIKSON	NORTHROP GRUMMAN	Company
0004	WALTER R. BAK	VECTRA	Company
0005	EDWARD M. DAVIS	NAC INTERNATIONAL	Company
0006	ARLENE B. SELBER	TEMMECO	Company
0007	WILLIAM J. McCONAGHY	SIERRA NUCLEAR CORP	Company
0008	MARILYN F. MEIGS	BNFL INC.	Company
0009	JACK EDLOW	EDLOW INTERNATIONAL	Company
0010	Dr. Walter C. Nodean	IES Utilities	Utility
0011	Mr. William Hehr	RSB LOGISTIC INC.	Company
0012	CHARLES R. WITT	CHEM-NUCLEAR SYS.INC	Company
0013	STAHL IND. INC	STAHL INDUSTRIES, INC	Company
0014	GARY W. SMITH	B&W NUCLEAR ENVIRONM	Company
0015	JOHN IACOVINO	WESTINGHOUSE ELE. CO	Company
0016	JAMES E. DAUST	COMM VEH SAF. ALL	Public Interest
0017	C.F. GROCHMAL	STONE & WEBSTER ENG	Company
0018	ROBERT M. GRENIER	GENERAL ATOMICS	Company
0019	LEO W. SCULLY	LOS ALAMOS TECH. ASS	Government
0020	CAROLE B. BENTZ	E.J. BENTZ & ASSO,	Company
0021	O. BENJAMIN SCHOEPFLE	ARGONNE NATIONAL LAB	Government
0022	CHERYL A. FAUBERT	GOVERNMENTAL DYNAMIC	Company
0023	JEFFERY S. SHULMAN	ADVENT ENGINEERING	Company
0024	Rosa Yang	Electric Power Res	Company
0025	LARRY DANESE	PRIV.	Public Interest

1. RESPONSE LETTERS SUMMARY REPORT (Continued)

0026	Joe F. Colvin	Nuclear Engery Inst.	Utility
0027	JOHN D. SIMCHUK	PAC TEC	Company
0028	RICHARD M. SAVIGNAC	J&R Engineering Co.	Company
0029	HOWARD S. SHIMON	WASHINGTON NUC. CORP	Company
0030	ROBERT R. LOUX	NUCLEAR WASTE PROJ.	Government
0031	MIKE DUNCAN	B D C SERVICES, INC.	Company
0032	LAWRENCE E. WZOREK	UNION PACIFIC RAIL	Company
0033	STEVE SHIRE	TRANSMOLDAL CORP.	Company
0034	GEORGE F. RELLINGER	NELSON MANUF. COMP	Company
0035	ERIC DANGLE	SYSTEMATIC MAN. SERV	Company
0036	ALAN S. HANSON	TRANSNUCLEAR INC.	Company
0037	DR. JOHN BARLETT	RESOURCE APPLIC. INC	Company
0038	MARTIN G. EVERY	ESSEX CORP.	Company
0039	DANIEL NIX	WESTERN INTERSTATE	Government
0040	Eileen Supko	Energy Resources Int	Public Interest
0041	David A. Ferg	HOLTEC INTERNATIONAL	Company
0042	Joselito O. Calle	CALLE & ASSOCIATES	Company
0043	BLAKE R. WILLIAMS	KINDRICK TRUCK CO.	Company
0044	Mr. Dale DeCesare	WESTERN INTERSTATE	Company
0045	JOSEPH A. MALLEY, SR.	MARTIN GUERIN &	Company
0046	J. Pride	Scientific Ecology	Public Interest
0047	Tim Dooley	INMARK, INC.	Company
0048	Mr. Bob Branick	Raytheon Engineers &	Company
0049	Rita Bowser	Studsvik Inc.	Company
0050	Joel Carroll-Maxwell	Tri-State Motor	Company

1. RESPONSE LETTERS SUMMARY REPORT

Resp ID	Sender	Organization	Commentor
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As stated in the ROD, DOE will not accept LEU spent fuel from any individual foreign research reactor until the HEU spent fuel at that reactor has all been shipped, unless there are unusual circumstances (e.g., deterioration of one or more LEU elements sufficient to cause a safety problem if acceptance were delayed). In addition, DOE will not accept spent fuel (HEU or LEU) from new foreign research reactors starting operation after the date of implementation of the policy.

The ROD specifies that the United States will charge high-income-economy countries a fee that will be published in a separate Federal Register Notice (this constitutes that notice). The ROD also specifies that DOE will bear the full cost of shipping and managing foreign research reactor spent fuel from other countries, including at-reactor preparation. The countries from which spent fuel would be accepted, and definition of whether or not they are considered to be high-income-economy countries, are listed in the ROD and the Final EIS. The Final EIS also identifies the estimated number of spent nuclear fuel shipments from each country, and the estimated number of casks each country would ship.

The fee will be no higher than \$4,500 per kilogram of total mass (not heavy metal mass) for aluminum based spent fuel containing HEU and TRIGA spent fuel and no higher than \$3,750 per kilogram of total mass for aluminum based spent fuel containing LEU. Total mass includes, among other things, the mass of cladding, structural materials, the aluminum fuel matrix, overpack canning. The actual fee will be established in DOE's spent fuel acceptance contracts. These fees will be used to cover all aspects of receipt and management of the spent nuclear fuel by DOE, including geologic disposal. The cost of preparing the spent nuclear fuel for shipment to the United States (e.g., inspection, documentation, and canning, if necessary), and shipping the spent nuclear fuel to a DOE spent fuel management site in the United States, is not included in the fee and is not an obligation of the United States. These costs will be borne by the individual reactor operators in high-income-economy countries. Fees are due and payable upon DOE acceptance of the spent nuclear fuel at the DOE management site.

No fee is specified in this notice for acceptance of target material. This fee will be established separately at a later time.

Spent fuel not covered by a valid DOE acceptance contract, DOE reserves the right to modify the fee

upward or downward at any time to respond to changed circumstances, including a change in the cost of managing the spent fuel in the United States.

Issued at Washington, DC, on May 22, 1996.

Jill Lytle,

Deputy Assistant Secretary, Office of Nuclear Material and Facility Stabilization
Environmental Management

[FR Doc. 96-13283 Filed 5-24-96; 8:45 am]

BILLING CODE 5430-01-P

Notice of Waste Acceptance, Storage, and Transportation Services

AGENCY: Office of Civilian Radioactive Waste Management, Department of Energy.

ACTION: Request for expression of interest and comments.

SUMMARY: The Office of Civilian Radioactive Waste Management (OCRWM) is responsible under the Nuclear Waste Policy Act of 1982, as amended (NWPA) for transporting spent nuclear fuel (spent fuel) from commercial nuclear reactor sites to a Federal facility for storage or disposal. The Standard Contract for Disposal of Spent Fuel and/or High Level Radioactive Waste (10 CFR part 961) details the arrangements between the Department and the owners and generators of spent fuel (Purchasers) for the Department to accept the spent fuel at the Purchasers' sites for transport to the receiving Federal facility. Section 137(a)2 of the NWPA requires the utilization of private industry to the "fullest extent possible" in the transportation of spent fuel.

OCRWM is developing a plan for the performance of its waste acceptance, storage and transportation responsibilities which are set forth in the NWPA and Standard Contract and is soliciting input from interested parties as to its proposed approach.

DATES: Submissions of interest and comments in response to this Notice should be received by the Department no later than three weeks from the date of this announcement. A presolicitation conference may be held this summer, if so, a separate Notice will be issued identifying the date. Respondents to this Notice will be placed on a list to receive additional information which may include draft solicitation documents in preparation for the presolicitation conference.

ADDRESSES: Submissions of interest including any comments should be sent to: Michelle Miskinis, Contracting Officer, U. S. Dept. Of Energy, 1000

Independence Ave. SW, Attention: HR-561.21, Washington D.C. 20585.

FOR FURTHER INFORMATION CONTACT: Ms Michelle Miskinis (DOE/HR-561.21), 202-634-4413 or Ms Beth Tomasoni (DOE/HR-561.21), 202-634-4408.

SUPPLEMENTARY INFORMATION: The following describes key features of the OCRWM proposed approach:

Scope of Services: DOE anticipates contracting for supplies and services which would include: accepting spent-fuel from Purchasers' facilities (as identified in the Acceptance Priority Ranking and Annual Capacity Reports and supplying compatible transportation (and possibly storage) casks and equipment and transporting spent-fuel to a designated Federal facility. Contractors would also be responsible for any intermodal transport required, including heavy haul.

Contractors may be permitted to alter the order of spent-fuel acceptance to achieve efficiency of operation or to lower costs. Contractors would work with Purchasers to determine the best way to service a site and would recommend preferred transportation routes to the Federal facility. Contractors will also be required to interface with those State, Local and Tribal governments along the selected routes.

The location and type of Federal facility (either a repository or an interim storage facility (ISF) cannot yet be determined. Initially, spent-fuel delivered to the Federal site would be canistered before arrival at the facility, but at some point in the service period the contractor may be required to handle uncanistered spent-fuel. Transportation and storage equipment to be supplied would be required to comply with applicable Nuclear Regulatory Commission (NRC) and Department of Transportation (DOT) regulations, OCRWM acceptance criteria, and standard commercial practices.

Contract Type: Competitive, fixed-price type, contracts are being considered with a phased implementation that includes sequential development of business/servicing plans describing contractors' individual approaches, fabrication/acquisition of hardware, and transportation services operations. More than one award is anticipated. One approach under consideration is to divide the country into regions, for example, the four NRC regions. No contractor would be awarded more than two regional service contracts. It is envisioned that there will be several Requests for Proposals (RFPs) issued over several decades for these

**Notice of
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U.S. Department of Energy

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Michelle Miskinis, Contracting Officer

U. S. Dept. Of Energy

1000 Independence Ave. SW

Attention: HR-561.21

Washington D.C. 20585

**For Further Information Contact: Ms Michelle Miskinis (DOE/HR-561.21), 202-634-4413
or Ms Beth Tomasoni (DOE/HR-561.21), 202-634-4408**

Supplementary Information: The following describes key features of the OCRWM proposed approach:

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Contract Term: A contract term of five to ten years is envisioned. This would allow a contractor two to three years to procure transportation and storage equipment and achieve operational readiness. Performance of waste acceptance and transportation services would take place over the remaining period of any contract. A service period spanning several years also would allow contractors the flexibility to improve the efficiency of operations and reduce costs.

Schedule: Schedule specifics will be addressed in any solicitation. For planning purposes, it is expected that a Federal facility could be in operation to receive spent fuel within four years of statutory direction, and contractors could be expected to begin developing service arrangements with Purchasers two to three years before spent fuel shipment.

Submissions of Interest

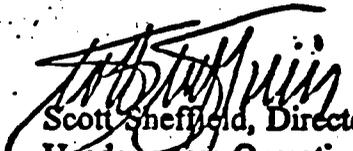
OCRWM is interested in receiving expressions of interest and comments relating to this proposed approach for carrying out its waste acceptance, transportation and any storage functions especially with regard to the following issues:

- 1. The ability of transportation service contractors and individual Purchasers to reach agreement on methods and schedules for servicing specific utility sites, including ways to foster Purchaser cooperation.**
- 2. The willingness of Purchasers to construct temporary or permanent physical plant modifications and to obtain license amendments or technical specification changes that would improve the efficiency and reduce the costs of loading and removal of spent fuel from individual plants.**
- 3. The reasonableness of dividing the country into a number of regions to preserve competition and industrial capability in the marketplace, while still ensuring low cost services to OCRWM.**
- The capability of the nuclear industry to acquire sufficient spent fuel canister, transportation cask, and storage module production capacity to meet near-term service contractor requirements.**
- 5. Potential business arrangements/pricing structures which might increase contractor freedom and flexibility to develop and implement innovative approaches to improve system efficiency and lower costs, reduce or eliminate the need for front-end financing by OCRWM of contractor activities and procurements, or mitigate risks associated with programmatic uncertainties.**
- 6. Alternative methods of structuring this procurement to ensure competition on future procurements.**

DOE will consider and may utilize all information, recommendations, and suggestions provided in response to this notice. Respondents should not provide any information that they consider to be privileged or confidential or which the respondent does not want disclosed to the public. DOE does not intend to respond to comments, either to individual commentors or by publication of a formal notice. Each submittal should consist of one original and three photocopies.

This notice should not be construed (1) as a commitment by the Department to enter into any agreement with any entity submitting an expression of interest or comments in response to this Notice, (2) as a commitment to issue any RFP concerning the subject of this Notice, or (3) as a request for proposals.

Issued in Washington, D.C. on May 21, 1996.


Scott Sheffield, Director
Headquarters Operation Division "B"
Office of Placement and Administration

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**Environmental Transport, Inc.
Suite 350
1013 Centre Road
Wilmington, DE 19805-1297**

June 10, 1996

**Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave. SW
HR-561.21
Washington, DC 20585**

**In Re: Request for Expression of Interest and Comments on DOE's Notice of Waste
Acceptance, Storage and Transportation Services, 61 Fed. Reg. 103 (May
28, 1996)**

Dear Ms. Miskinis,

**This response is being submitted on behalf of Environmental Transport, Inc.
("ETI"), a Delaware Corporation, to the Request for Expression of Interest and
Comments Regarding Office of Civilian Radioactive Waste Management
Transportation Plan ("EOP") published in the Federal Register on May 28, 1996.**

**Set forth below are ETI's comments on the six specific issues DOE wanted
interested parties to address:**

**1. ETI sees no reason why the prospective transportation contractors (hereafter
"carriers") and utilities (hereafter "utilities") will not be able to reach agreement on
the methods and schedules for servicing specific utility sites. It appears to be in the
mutual interest of both to reach an accommodation to move spent fuel in a timely
and cost efficient manner. The ranking of fuel in the queue or the exchange of
transportation allocations between utilities is of no particular concern, at least at this
early stage, to a prospective carrier.**

**With the proper equipment, adequate notice, sufficient financial incentive and a
cooperative shipper, a carrier will be able to provide the necessary level of service.**

2. The willingness of utilities to make either temporary or permanent modifications to their physical plants to reduce the costs of loading and removal of spent fuel is entirely up to the utilities. Based upon the type and size of motor carrier equipment necessary to provide service, the carrier may well have some input. Certain plant modifications may well expedite the removal, encasement and loading of spent fuel.

Generally the cost of transportation includes the amount of time spent by the carrier staging equipment, loading the cargo and preparing the cargo for over-the-road shipment. Any plant modifications that would decrease the amount of time or effort spent by the carrier should result in a lower transportation cost.

3. In order to preserve competition it may or may not be reasonable to divide the country into a number of regions. The cost of acquiring necessary equipment and providing service may have the most impact upon establishing and maintaining a competitive environment. Also the number of contracts awarded would be a factor.

So much of the feasibility of this proposal depends upon who will provide financing for the design, manufacture and acquisition of the specialized over-the-road equipment. With an undertaking of this magnitude and duration, it is improbable that any carrier would front any cost on a purely speculative basis. Something much more secure will be necessary in order to induce a carrier to become involved.

As the project matures the advisability of this proposal may or may not become obvious.

4. With sufficient lead time, which would include necessary regulatory approval, the nuclear industry should be able to acquire sufficient approved canisters to use in the transportation and storage of spent nuclear fuel. This again is solely within the purview and control of the utilities.

5. Pricing structures, long and short term financial obligations, equipment design, manufacture, acquisition and operation costs, anticipated maintenance expenses, anticipated profitability and a number of other financial issues are all of concern to a proposed transportation provider. This may well be one of the most significant elements in this proposal. A tremendous amount of thought must be devoted to this aspect.

6. Future competition will depend upon a host of factors, the most important of which is probably the profitability of the undertaking.

ETI respectfully requests that it be placed on the mailing list so that it will receive copies of all future Notices and any other information distributed by the Department. Furthermore ETI supports the notion of a presolicitation conference. If one is scheduled, ETI would respectfully request adequate notice so that its representatives can be present.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "RT Roberson", with a long, sweeping horizontal line extending to the right.

Roger T. Roberson
Environmental Transport, Inc.

6-18-1996 3:01PM FROM YANKEE CO 508 552 3704 P. 2

YANKEE ATOMIC ELECTRIC COMPANY

Telephone (508) 779-6711
TWX 710-360-7619



580 Main Street, Bolton, Massachusetts 01740-1398

June 18, 1996
FYC 96-004

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave SW
Attention: HR-561.21
Washington, D.C.

SUBJECT: Response of Yankee Atomic Electric Company to the "Office of Civilian Radioactive Waste Management, Department of Energy, Request for Expression of Interest and Comments - Notice of Waste Acceptance, Storage, and Transportation Services" (61 FR 26508, dated May 28, 1996)

Dear Ms. Miskinis:

Yankee Atomic Electric Company (Yankee) provides the following comments in response to the subject notice request involving the Office of Civilian Radioactive Waste Management (OCRWM). Yankee is the owner of the Yankee Nuclear Power Station in Rowe, Massachusetts and provides engineering and licensing services to nuclear power plants in New England. Because Yankee Rowe is permanently shut down and is in the process of being decommissioned, Yankee is vitally interested in the DOE's plans regarding waste acceptance, storage and transportation.

SUMMARY OF COMMENTS

1. Shutdown commercial reactors like Yankee have been given -- by contract -- priority consideration in the acceptance of their spent fuel. To accommodate this need, the contractor must be allowed reasonable flexibility to alter the schedule. Accordingly, Yankee supports the DOE's initiative to provide this flexibility.
2. Besides complying with the legal rights of shutdown plants, flexibility provides the added bonus of greater speed and economy. One way is to remove larger quantities of spent fuel in fewer campaigns, a concept which Yankee has long supported.
3. Yankee favors the competitive free market. We are concerned that DOE's "privatization" effort entails a 2.5 year single-contract drafting process which will create its own bureaucracy and regional non-competitive situation. Utilities should be allowed to sign their own contracts to see if they can get better, faster and cheaper services. To the extent a utility can save money over what DOE is willing to spend for the same service, that savings should go to that utility.

4. DOE does not need to be the vendor or contractor to fulfill its obligation; but it must provide the essential framework for the utilities to help themselves. First, DOE should maximize the use of systems currently available, rather than design new ones, and accept all casks that are certified for transport and licensed for at-reactor storage. Second, DOE must get the political and regulatory approval for the transportation corridors that will be needed.

Each of the above four items are discussed in greater detail below. In addition, responses to six issues raised specifically by OCRWM are also provided.

DISCUSSION

1. The Priority Acceptance Provisions of the NWPA and Standard Contract Must Be Met

From the very beginning, common sense and flexibility were expected to be part of the Waste Program. Spent fuel was expected to be shipped "expeditiously" and shutdown plants were expected to be given priority. The Nuclear Waste Policy Act of 1982 states, "... the Secretary shall take title to the high level radioactive waste or the spent fuel involved as expeditiously as practicable upon request of the generator of such waste or spent fuel." The Standard DOE Contract says, "Notwithstanding the age of the SNF and/or HLW, priority may be accorded any SNF and/or HLW removed from a civilian nuclear power reactor that has reached the end of its useful life or has been shut down permanently for whatever reason." Thus, DOE's recently proposed language to provide schedule flexibility to contractors is consistent with the intent of both the law and the contract.

Enabling contractors to provide priority to Yankee's SNF will not impact the shipment schedules for other reactors. There are only 533 spent fuel assemblies (127 MTUs) in storage in the spent fuel pool (SFP) at Yankee. DOE's waste management system can easily handle this small quantity which is less than 1/2 of 1% of the total SNF discharged to date. Even if DOE grants priority status to all the other prematurely shutdown reactors, the effect on the acceptance rate is still minimal.

The implementation of the priority clause will significantly lower costs for both Yankee and DOE. Yankee must store the SNF onsite in the spent fuel pool and/or a dry storage system until it is removed by DOE. By enabling the contractors to implement priority, an unnecessary cost on the order of \$70-90 million (the amount needed to build a storage facility and store the fuel at the Yankee site for this added period) can be avoided. Furthermore, savings can also be achieved for the Waste Program by consolidating the number of redundant removal campaigns at shutdown plants, particularly smaller units such as Yankee.

2. DOE Should Maximize Schedule Flexibility and Cost Effectiveness

DOE's current schedule for taking Yankee's SNF offsite is based on the "Oldest Fuel First" criteria formulated in DOE's "Annual Capacity Report" which covers the first 10 years of the Waste Program's operation. According to this schedule, 38 tons of SNF or about 30% of Yankee's total will be removed. Then, two more decades will pass before all of the remaining 70% is removed.

It makes no programmatic or economic sense for the contractor to come to Yankee's site four times in five years to remove a total of what constitutes only 1% of DOE's capacity for that five-year period (38 tons vs. 3700 tons). If all DOE is going to take is 1%, why not just come once instead of four times. In fact, while DOE is there, why not take all of it -- 3% instead of 1% of DOE's 5-year capacity -- and never have to come back again, ever?

Yankee's situation is not unique. Indeed, the current schedule makes the DOE contractor perform 264 campaigns at 43 different reactor sites during the first 10 years of the program. This is an average of shipping from 26 different locations each and every year and an average of five return visits to each site over the first ten years. By removing larger quantities in fewer campaigns, significantly better economies can be achieved. If, for example, the SNF allocation was consolidated from annual groupings to five-year groupings, the average number of annual campaigns could be reduced from 26 per year to eight, a reduction of two-thirds.

Such consolidation would streamline operations and allow the contractor to better allocate and direct resources. While multi-year groupings may alter the sequence of site visits within the five-year period, in the end the same quantities would be removed from each site as under the annual allocation schedule and at less cost to the program. Thus, under such a multi-year scheme, Yankee's 38 MTU allocation could be more efficiently removed in a single campaign by the contractor during the first five years of the program - instead of in four separate annual campaigns. Further, since the contractor would be removing 30% of Yankee's spent fuel during this period, and because the remaining 90 MTUs at the site represent such a small quantity relative to the Waste Program's annual capacity, there is a clear and compelling economic argument for enabling the contractor to complete the removal of spent fuel from the site during the same campaign or time period - rather than delaying completion for 20 or more years.

3. Allow Utilities To Develop Their Own Contracts

Yankee supports the concept of empowering utilities to control as much of the SNF disposal costs as possible and, to that end, supports the right of utilities to hire their own DOE-licensed storage and transport contractor. Empowering the utility to act independently increases competition among the contractors, increases the options available to utilities, and avoids the long and expensive government bidding process. Different contractors can meet different utility needs and utilities would be free to form their own consortiums where appropriate. Furthermore, giving utilities direct control reduces centralized bureaucracy and speeds the process. The best way to foster competition is to let it

*Letter, IAEC to U.S. Department of Energy
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happen.

Utilities routinely negotiate contracts for Low Level Waste shipments to disposal sites. Thousands of shipments are made each year without the need for government-provided regional shippers. This is a good example of how a DOE model should function for High Level Waste shipments. The criteria for waste acceptance are clear, rules for shipping are well-understood, and the utilities hire the contractors that can best meet their needs at the lowest price.

4. Maximize the Use of Existing Systems

DOE need not control every aspect of the process to accomplish its mission. Instead it should focus on those critical areas where its expertise is needed to enable utilities to help themselves. For example, providing approved transportation corridors as soon as possible will give utilities and contractors alike an early start in planning their spent fuel shipments. It will be at this point when regionalization may become attractive as utilities and contractors seek to exploit the synergy of joint shipping. On the other hand, postponing the route-approval process only delays the ability of utilities to plan appropriately. Similarly, uncertainty over the future acceptability of storage/shipping casks can also inhibit effective action by utilities. Accordingly, DOE should declare all suitably-licensed casks to be acceptable for its storage facility now.

RESPONSES TO SIX SPECIFIC OCRWM CONCERNS

The Federal Register Notice states that OCRWM is interested in comments regarding six specific issues. Yankee's comments follow:

- #1) Consistent with our preceding comments regarding provisions of the Nuclear Waste Policy Act and the Standard Contracts for shutdown reactors, Yankee supports the proposal that the Contractor can modify the methods and schedules of spent fuel removal to best serve a site, achieve efficiency, and lower costs.
- #2) Purchasers should be willing to make certain site specific modifications and/or take actions to improve efficiency and reduce the costs of loading and removing SNF from the sites. However, any additional costs incurred in this regard should be fully reimbursable expenses.
- #3) The concept of dividing up the country into a number of regions to, "...preserve competition and industrial capability in the marketplace, while still ensuring low cost services to OCRWM." is likely to create more problems than it solves. For example, how would the boundaries be drawn? How would DOE insure that comparable service was being provided to customers in different regions? How is competition promoted within any region when only one or two contractors are allowed in? Issues such as fairness and competitive disadvantages between regions could cause unnecessary and lengthy delays. A better scheme is one that

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Page 5

maximizes free market competition by allowing utilities to form their own regional consortiums if that turns out to be better, faster and more economic.

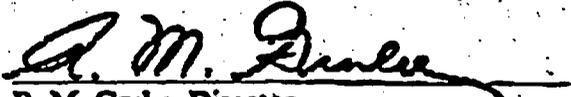
#4) We believe that the nuclear industry can develop sufficient spent fuel canister, transportation cask, and storage module production capacity to meet near-term service contractor requirements. However, this capability will be significantly enhanced when the regulatory requirements for these systems are established by the government, particularly with regard to the criteria for acceptance at a Federal interim storage facility. As stated previously, DOE should maximize the use of systems that are currently available and accept all licensed casks.

#5) We support the concept of incentive pricing and, to promote competition and lower cost, we suggest that a bonus scheme be combined with the right of each utility to hire his own contractor. For cost accountability, the utility's costs would be subject to audit and reimbursable through the Waste Fund. In addition, an incentive program can be established to promote greater cost competitiveness, whereby any savings should be allocated to utilities as they achieve them.

#6) As stated above, Yankee believes that empowering utilities to act independently to the maximum extent possible will be the most efficient way of achieving real economies. Centralizing the decision making at DOE under a one-size-fits-all philosophy will only add more delay and more costs, and should be avoided.

Yankee will be happy to discuss these and related issues with DOE staff at any time. Thank you.

Sincerely,
YANKEE ATOMIC ELECTRIC COMPANY


R. M. Grube, Director
Fuel Management Department

3

NORTHROP GRUMMAN

Address: 2000 Independence Avenue SW
Washington, DC 20585
Phone: (202) 452-3000
Fax: (202) 452-3000
E-mail: ngr@northropgrumman.com

In reply refer to:
RAIL-MS-96-0024
14 June 1996

U.S. Department of Energy
1000 Independence Avenue SW
HK-561.21
Washington, D.C. 20585

Attention: Ms. Michelle Miskinis
Contracting Officer

Subject: Expression of Interest and Comments regarding OCRWM's
Transportation Plan Commerce Business Daily (CBD) dated 05-24-96

Northrop Grumman Corporation is pleased to respond with our expression of interest regarding OCRWM's transportation plan, solicited in the 24 May 96 issue of Commerce Business Daily (CBD). Please include us on the bidder's list such that we receive additional information, draft solicitation documents, meeting and conference notices, et. al., pertaining to this new direction in waste acceptance, storage and transportation.

Please find our comments to certain issues raised in the CBD, for carrying out the new proposed approach in dealing with this Nation's civilian reactor generated Spent Nuclear Fuel (SNF), below.

CBD Issue No. 3 - Reasonableness and Regionalization

While we support splitting the country into regions for industrial base preservation, competition and procurement purposes, we believe that including both NRC-licensed hardware and non-licensed hardware might be disadvantageous to the government. We recommend that a careful treatment of the impacts due to proliferation of various hardware types (non standard) and the associated complexities (increased costs) introduced into the transportation and final acceptance at a federal facility be considered on an economic basis. The compelling reason for this recommendation is that these costs may, in the long term, far exceed the benefits derived by shifting the development investment to industry.

NORTHROP GRUMMAN

Marine Systems
Electronic Sensors and Systems Division
Northrop Grumman Corporation
Post Office Box 3499
Honey Avenue
Sunnyvale, CA 94088-3499

In reply refer to:
RAIL-MS-96-0024
14 June 1996

U.S. Department of Energy
1000 Independence Avenue SW
HR-561.21
Washington, D.C. 20585

Attention: Ms. Michelle Miskinis
Contracting Office

Subject: Expression of Interest
Transportation Plan

R-

Please fax to:

105-24-96

Northrop Grumman Corporation
interest regarding OCRWM's 1
issue of Commerce Business D
such that we receive additional
meeting and conference notices
acceptance, storage and transport

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Please find our comments to cover
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CBD Issue No. 3 - Reasonableness

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RAIL-MS-96-0023
14 June 1996

Page 2

Certainly many designs will be in existence in different regions, with the proposed approach, however, they still would be required to be transported on the same common denominator, the nation's railroad system. The potential for significant costs as a result of the nation's railroads having to control Nuclear shipments and charging a premium, given the low volume SNF shipments represent in their overall business, certainly need to be considered.

One way to mitigate the impact of this approach is to separately procure the railcars and provide access to the fleet of railcars to the various "regional managers" for use in transporting SNF to the Federal facility. The railcar design is not licensed by the NRC, and can easily accommodate the multitude of projected NRC licensed payload (Casks) differences through standardizing the interface for the shipping skids.

One must carefully look at the Nations railroad industry, it's heritage for standardization / simplicity and requirements for new (Nuclear) cars to fully understand the concern we are raising. First, the amount of interchange represented by the projected shipments of SNF barely even "make the chart". Reference is made to data, attached, from the Association of American Railroad's (AAR) that clearly shows SNF shipments by rail are not projected to be a major commodity by volume for the industry. In fact, given the stringent requirements that would relate to shipments of Nuclear material, it may involve significant negative impacts to the shipments of other commodities.

This detrimental effect would certainly be amplified if a proliferation of railcar designs were allowed to be introduced by region. The impacts would be further increased and exacerbated, in that maintenance costs would increase, training costs would increase, political arguments with regard to safety would be more complex and it would directly translate into anticipated higher costs to ship SNF, ultimately paid for by DOE.

Additionally, each railcar design would also be required to be tested and qualified to AAR standards, with the associated cost being recovered (paid ultimately by DOE) by a factor, in the worst case, equal to the number of regions. If shipments of SNF by rail are to occur, then the DOE should consider utilizing a single railcar design as the most efficient politically and economically. The DOE's procurement practice should be to buy the railcars separately, and provide them to the regional managers of SNF shipments.

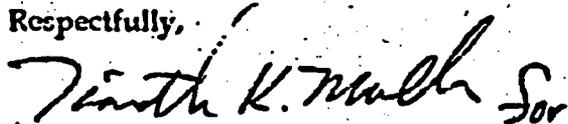
The railcar procurement could be structured to provide an adequate quantity to be purchased initially, with options for follow-on units, which would foster investment related to this critical piece of hardware. If the procurement is divided and left to each regional team, it is believed that the high business risk coupled with the low quantity will not economically drive an investment to bring the railcar technology to the marketplace. The railcar fleet could be adequately competed, and further, more than adequate sub-competition exists for components and services associated with the railcar construction.

CBD Issue No. 4 - Industry Capability

We also believe that a sufficient industrial base exists presently, with excess capacity, for the supply of materials and fabrication of other hardware (i.e. SNF canisters, transportation casks, transfer casks, ancillary equipment) to meet the near term needs of potential service contractors. Our factory alone in Sunnyvale, CA has capacity currently to handle all of the needs for transportation casks and related equipment, and we are aware of others with the same situation. This should not pose a problem for DOE.

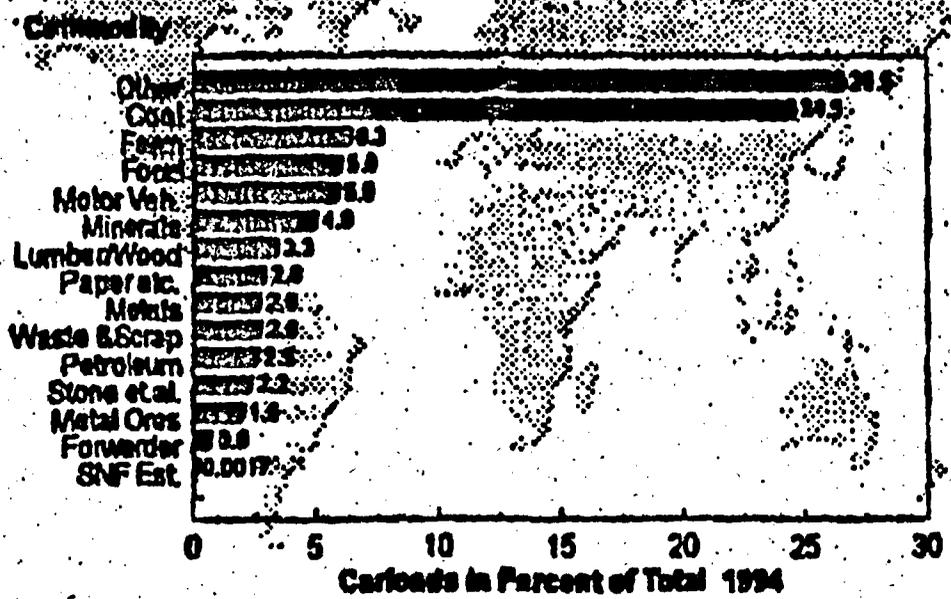
The original and three copies are sent under separate cover per your request. Thank you for your consideration of our input and inclusion on the bidder list.

Respectfully,



Edward E. Erikson
Program Manager

Carloads by Commodity 1994



Source: AAR MAY 96 R. FLOREZAR

4



VECTRA

June 13, 1996

U.S. Department of Energy
1000 Independence Ave. SW
Attn: HR-561.21
Washington, DC 20585

Attention: Ms. Michelle Miskinis
Contracting Officer

Subject: Office of Civilian Radioactive Waste Management Transportation Plan

Dear Ms. Miskinis:

VECTRA is submitting this letter to express our interest in the Office of Civilian Radioactive Waste Management (OCRWM) Transportation Plan and Program.

VECTRA is a leading supplier of nuclear spent fuel packaging, storage and transport systems for the commercial nuclear and DOE applications. VECTRA is an industry leader in canister-based storage and transportation systems with its NUHOMS® system. This system is very compatible with the DOE's vision of handling commercial spent nuclear fuel. Additionally, VECTRA has designed and procured several types of casks for the shipment of spent nuclear fuel. These include the following:

- The 125-B transport cask for shipment of the TMI-2 fuel debris canisters
- The MP-187 transport and storage cask currently under licensing review
- The TRUPACT II cask for shipment of transuranic waste

VECTRA also owns and operates two IF-300 casks used for shipment of nuclear spent fuel.

VECTRA would also like to provide comments on the Request for Expression of Interest and Comments. Our comments are provided in Attachment "A".



VECTRA

We appreciate the opportunity to respond to your request and look forward to assisting you with your program objectives. Please contact Mr. Vince Franceschi (408-281-6007) or me (510-275-3788) if you have any questions or require further information.

Very truly yours,

**Walter R. Bak
Vice President**

cc: V. Franceschi (w/ attach)

ATTACHMENT "A"

Comments on OCRWM Transportation Plan

Issue #1: Ability of transportation service contractors and individual Purchasers to reach agreement on methods and schedule for servicing specific utility sites.

1. The transportation plan requires the service contractor to reach agreement with the Purchaser (utility) on schedule for spent fuel shipment. While this cooperation can be achieved, there is an issue with guaranteeing the number of shipments under the planned contract lengths. The service provider is required to make a significant investment in transportation hardware and this expenditure should be tied to a minimum number of shipments as opposed to a duration of contract. This would ensure that each service contractor has the ability to recoup its initial investment.

2. The strategy to get spent fuel from the plant to the central facility can vary by utility and its current spent fuel storage basis. A key issue in containing program costs will be the individual transportation strategies developed for each plant site. The development of the strategy will also determine the facilities needed at the central facility in order to receive the spent fuel. Potential considerations are canisterizing all spent fuel vs. allowing shipment of bare fuel assemblies for packaging at the central facility. With the existing diversity of the installed dry storage base, agreements around strategy are a potential means for engaging the utilities in the program.

Issue #3: The reasonableness of dividing the country into a number of regions to preserve competition and industrial capability, while ensuring low cost services.

3. The division of the country into geographic regions provides one means of providing several contracts to preserve competition and industrial capability. Other distinctions based on fuel types, existing storage system types, or groups of utilities may provide a basis for achieving lowest program cost.

Issue #4: The capability of the industry to acquire sufficient spent fuel canister, cask, storage module production capacity to meet near-term service contractor requirements.

4. The capability exists to acquire sufficient equipment necessary to meet market demand. However, the investment cost for the service provider is significant. The contract has to provide a commitment of shipments in order to obtain the necessary level of investment required to provide the needed equipment. The main issue for capacity will be obtaining necessary NRC licenses in a timely manner as opposed to production capability.

Issue #5: Potential business arrangements which might increase contractor freedom and flexibility to develop and implement innovative approaches ...

5. The transportation plan is dependent on the final configuration of the centralized facility. The design of this facility (especially if an interim facility) can affect the ability of the service provider to provide innovative solutions. For example, a centralized facility that can accommodate different storage modes (such as receipt of the canisterized fuel with its storage overpack) can minimize costs at the interim facility. The DOE would not be required to provide the storage overpack. This example provides a means for reducing up front DOE costs.

6. A strategy that allows for differing types of shipments and fuel handling may result in a central facility and transportation plan that can overall reduce the program cost. The trade-offs include the cost of facilities that will be developed at the central facility against the costs of the licensed transport packages (canisters, casks, etc.). A comprehensive review of possible alternatives for handling and storing fuel at the central facility will provide for the maximum innovation from the service contractors.

Issue #6: Alternative methods of structuring the procurement to ensure competition on future procurements.

7. A key element of this procurement relative to future procurements is whether the DOE will lease or purchase the transportation equipment. Since a significant investment in hardware is required, the lease option will greatly limit competition in the future since those who own the equipment will have a significant cost advantage. Government ownership of equipment would preserve greater services competition in the future. However, government ownership would also result in a significant up front cost and may not be advantageous to DOE.

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Fax

- **DATE:** June 14, 1996
- **TO:** Ms. Michele Miskinis
Contracting Officer
- **FIRM:** DOE
- **FAX:** 202/634-4419
- **FROM:** Bud Auvil
- **PAGES:** 5
(w/cover)

Message

Dear Ms. Miskinis:

Attached is NAC International's response to DOE-OCRWM's request for an Expression of Interest on its proposed approach for waste acceptance, storage and transportation services.

The original and three copies are being sent to your attention today via Federal Express for arrival by 10:30 a.m. on Monday, June 17.

Best regards,



Bud Auvil
Director of Marketing

June 14, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy (HR 561.21)
1000 Independence Avenue, S.W.
Washington, DC 20585

Subject: Expression of Interest in and Comments on Office of Civilian Radioactive Waste Management (OCRWM), Department of Energy, Notice of Proposed Approach for Waste Acceptance, Storage, and Transportation Services (Federal Register/Vol. 61, No. 103/Tuesday, May 28, 1996/Notices, pg. 26508)

Dear Ms. Miskinis:

NAC International (NAC) is pleased to provide this expression of interest in response to the Department of Energy's (DOE) solicitation regarding possible market scenarios for the management and transportation of spent nuclear fuel and high-level radioactive waste.

NAC hereby expresses its interest to provide a quotation to DOE for its Waste Acceptance, Storage, and Transportation Services. NAC is the leading U.S. transport technology designer and transportation fleet operator; pioneer of the nation's first licensed spent fuel transportable storage system; and one of the world's foremost suppliers of nuclear materials transportation and storage services. Indeed, NAC's experience conducting over 3,200 safe shipments traveling more than 6 million miles, handling cask operations at more than 50 facilities worldwide, and securing over 60 complex license amendments for shipment of various fuel types makes us uniquely qualified for this upcoming solicitation. Our experience has been further summarized in the attachment to this letter.

DOE is to be commended for seeking to advance this issue, particularly through its stated intention to foster the development of market-driven transportation solutions, as prescribed by the requirement of the Nuclear Waste Policy Act of 1982 for utilization of private industry to the "fullest extent possible." Given strong congressional and industry support for the opening of a central storage facility in the very near term, it is obviously important that a complementary transportation infrastructure develop in concert with the acceptance of spent fuel from domestic utilities.

It is NAC's view that the necessary experience, know-how, technologies and capabilities exist today in the private sector to manage successfully and safely the expanded transport of spent fuel and high-level waste. The safety track record is, in fact, enviable and gives reason for confidence in the private sector's ability to meet the challenge ahead. The only impediment to the industry's development is the lack of a site to which to transport spent fuel. There is little question that the transportation industry would meet the need to respond to the successful

Ms. Michelle Miskinis

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licensing of a central storage facility for spent nuclear fuel. The Department's greatest challenge is simply to define the ground rules, provide a level playing field and put mechanisms in place that nurture, rather than impede, maximum use of the private sector and freedom of choice by the utility customer.

This letter also provides NAC's suggestion on approaches to management of spent fuel and nuclear waste transportation. These comments are contained in the form of both strategic program recommendations and specific responses to issues upon which the Department has solicited input.

STRATEGIC FRAMEWORK FOR SPENT FUEL TRANSPORTATION MANAGEMENT

No matter which approach OCRWM takes to execute its present responsibilities in this area, there are fundamental strategic principles that determine the success of a spent fuel transportation management program. NAC believes these principles should be instilled in the program's planning. These principles are presented in the six-point program below.

1. Ensure Maximum Reliance on the Private Sector

The Nuclear Waste Policy Act citation that the private industry be utilized to the "fullest extent possible" is the centerpiece in DOE's request for expressions of interest. Problems, however, have arisen whenever this principle has been interpreted as the use of a captive contractor or contractors to develop government designs. Delegation of as much scope to the private industry, as possible, with minimal determinism and redirection from OCRWM, is the best, most market-efficient policy.

DOE's recent attempt to develop a proposed transportable storage technology solution—the Multi-Purpose Canister System—is a testament to the desire among U.S. utilities and the U.S. Congress to limit government-based programmatic initiatives in the nuclear waste management program. It is also an endorsement of the private sector. In the wake of the termination of the program, several companies responded, including NAC, which is leading the development of a privately funded Universal Multi-Purpose Canister System™ (UMS™) at a fraction of the cost envisioned by the government and at no cost to the taxpayers.

2. Build on the Existing U.S. Transportation Infrastructure

Over the past 30 years, there have been more than 3,200 safe commercial spent fuel shipments with no release of radioactivity or harm to the public. The fundamental regulatory

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mechanisms, industry experience, and necessary technologies exist. The U.S. Department of Transportation has capably developed the regulations associated with nuclear material transportation. Because of private funding, multi-purpose technologies are either licensed or under U.S. Nuclear Regulatory Commission (NRC) review for license and, in some cases, have been purchased by utilities after detailed review and evaluation. These should be the technologies that form an approved set of OCRWM systems for the initial approach. As others invest and develop systems, OCRWM may include new entries later when they are approved.

3. Provide Maximum Freedom of Choice and the Widest Number of Competitive Options for the Customer

Any transportation paradigm should provide freedom of choice and options for the utility purchasers—the ultimate customer. Utilities have considerable experience in competitive procurement of goods and services. OCRWM should place the procurement of systems and services for waste acceptance, storage, and transportation in the hands of each utility purchaser or team of utility purchasers. Forcing purchasers to deal with a single contractor is contrary to their historical approach to obtaining the optimal cost/benefit relationship from procurements. A plan that allows for competitive procurement from an approved vendors' list will also ensure least-cost solutions for OCRWM.

OCRWM should consider a direct Waste Fund credit to utility purchasers as a mechanism to achieve the above objective and maximize private sector decision making.

4. Articulate Clear Policy with Respect to Acceptable Technology

OCRWM must enunciate a clear policy with respect to the cask and canister acceptability and compatibility criteria alluded to in its request for expression of interest. This must be done quickly so that present utility uncertainty over acceptable technology is eliminated and credibility of OCRWM's approach is established. A viable approach would be to establish NRC licensing approval as the standard for designation as an acceptable waste form. This is consistent with legislation currently under consideration by the Congress.

5. Use Packaging Technology as a Key Building Block

OCRWM should focus any transportation management approach on the casks and canisters which contain and ship the spent fuel. The apex of the Federal Waste Management System (FWMS) pyramid is the packaging technology. All other systems and services involve less restrictive technology with fewer licensing demands, and require little or no direct experience with spent fuel storage and transport to accomplish their standard functions. All of

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these systems and services support the packaging technology. OCRWM should embrace initiatives to ensure that companies involved in spent fuel packaging technology, as well as transport and operation, form the cornerstone of its approach.

6. Develop Emergency Preparedness Planning and Encourage Public Awareness

OCRWM has a legitimate role in fostering federal, state and local emergency response and preparedness training and should provide appropriate leadership in this area. At the same time, it is critical that public awareness education programs regarding spent fuel transport and shipping package safety and the need for spent fuel transport be encouraged under the stewardship of interested constituencies. A better-informed public will result in an atmosphere that is more supportive of spent fuel transport.

RESPONSES TO SPECIFIC OCRWM CONCERNS

With respect to the issues highlighted in the request for specific comment, the above transportation program principles provide the foundation for how these issues should be addressed. The following specific comments are offered for each issue in the order in which they are presented in the reference.

1. Transportation Services Contractors and Purchasers Agreement

By allowing the utility decision maker to select from the widest possible number of qualified contractors through solicitation, these problems are minimized. Purchasers will have the responsibility to ensure the execution of methods, schedules and costs. Incentive arrangements for both contractors and purchasers can also reduce disagreement on methods and enhance cooperation to meet schedules.

2. Willingness of Purchasers to Make Plant Modifications

The incentive approach described above is certainly available to enhance methods and schedules, encourage efficiencies and lower costs. It should also be kept firmly in mind that utility purchasers *want* DOE to accept and remove the fuel. The purchasers can begin to save money when this happens. Additionally, by allowing all contractors to bid to each purchaser, system and facility compatibility can be optimized.

Ms. Michelle Miskinis

June 14, 1996

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3. Regional Approach to Provision of Transportation Services

Implementation of a regional contractor scheme appears to be an artificial and bureaucratic concept that is not grounded in the practical realities and needs of a national transportation system. As such, the regional contractor scheme appears to be one of the highest cost, least competitive, and most difficult approaches to management of spent fuel transportation. The approach should maximize the choices and flexibility of the purchasers rather than foster the development of a government paradigm premised on artificial regions and the creation of contractor bureaucracies. Solutions which maximize reliance on the private sector and the marketplace will produce efficiencies and lower costs.

4. Capability of the Nuclear Industry to Meet Near-Term Requirements

OCRWM should have full confidence in the ability of the nuclear industry to meet the requirements of expanded spent fuel and high-level waste transportation, particularly with the four-year lead time envisioned by this request. As noted earlier, packaging designs are available; fabricators are qualified and eagerly waiting for a market to emerge; experience is in place; and investment capital is available.

5. Potential Business Arrangements/Pricing Structure

The NAC-proposed six-point Strategic Framework for Spent Fuel Transportation presented earlier contains the recommended approach to achieve the objectives listed under Item 5 in the request. Innovation in the packaging and transportation of radioactive materials has been proceeding for years, largely without DOE financing, and the emergence of an expanded free marketplace will ensure that competitive business arrangements and pricing structures continue.

6. Alternative Methods of Structuring This Procurement

The request proposes a contract term of five to ten years. Five years is not sufficient to optimize the process and realize its efficiencies; therefore, ten years is recommended. In this light, it seems clear that the best way to assure ongoing competition is the approach presented in NAC's six-point Strategic Framework. OCRWM needs to qualify suppliers that have developed multi-purpose technology. These suppliers are then qualified to offer their systems and services to all purchasers. New suppliers should offer the technology in which they have invested for review and qualification by OCRWM for the next qualification period. OCRWM should resist using procurement actions to establish an artificial marketplace.

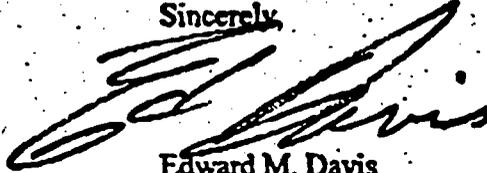
Ms. Michelle Miskinis

June 14, 1996

Page 6

NAC appreciates the opportunity to comment and looks forward to the opportunity in the future to offer its services and expertise to support OCRWM's important responsibilities for the stewardship of the nation's spent fuel and high-level waste.

Sincerely,



Edward M. Davis
President and CEO

Attachment

cc: The Honorable Hazel O'Leary
The Honorable Dan Dreyfus

SUMMARY OF NAC'S SPENT FUEL TRANSPORTATION/OPERATIONS QUALIFICATIONS AND EXPERIENCE

TRANSPORT CASK OPERATIONS

NAC has been a leader in spent fuel transportation services since 1974. NAC currently owns and operates the largest commercial fleet of spent fuel and high-level waste (HLW) transportation casks, vehicles and cask-handling equipment in the United States. Each of NAC's spent fuel transport casks possesses a COC. NAC has received numerous license amendments for the fleet, including 10 renewals of the transport cask COCs, which are required every five years. NAC has also obtained approval for amendments to ship various contents in these casks, including research reactor fuel, consolidated fuel rods, failed fuel, high burnup fuel, and other types of fuel and high-level wastes.

The transport cask fleet currently includes:

Five NAC-LWT Casks	Legal-weight truck casks licensed for MTR fuel, light-water reactor (LWR) fuel (one PWR/two BWR assemblies), metallic research reactor fuel and high-level waste
Five NLI-1/2 Casks	Legal-weight truck casks licensed for LWR fuel (one PWR/ two BWR assemblies), consolidated fuel, metallic research reactor fuel and high-level waste
Two NLI-10/24 Casks	Rail casks licensed for LWR fuel (10 PWR/24 BWR assemblies)

With over 3,200 safe shipments, traveling more than 6 million miles to more than 50 nuclear facilities, NAC is the leading U.S. transporter of spent fuel and high-level waste. NAC has transported the majority of all commercial spent fuel moved in the United States during the last 15 years. The COC for a legal weight truck (NAC-LWT) cask was obtained in 1990. The NAC-LWT transport cask is the only U.S.-approved cask designed to satisfy the 1985 IAEA requirements.

NAC casks have been used at the following sites:

Spent Fuel Shipping

AECL	Chalk River
Aerojet	Idaho
Arkansas Power and Light	Arkansas Nuclear 1
Babcock & Wilcox	Lynchburg
Baltimore Gas and Electric	Calvert Cliffs
Battelle	Columbus
Battelle Northwest Laboratory	
Carolina Power and Light Company	H. B. Robinson
Commonwealth Edison Company	Byron
Commonwealth Edison Company	Dresden 1 & 2
Commonwealth Edison Company	Quad Cities
Commonwealth Edison Company	Zion
Dairyland Power Cooperative	LaCrosse
Department of Energy	Nevada Test Site
Duke Power Company	McGuire
Duke Power Company	Oconee 1, 2 & 3
Florida Power and Light Company	Turkey Point 3 & 4
Florida Power Corporation	Crystal River
General Electric	Morris
Georgia Institute of Technology	Neely Research Reactor
Georgia Power Company	Hatch 1
Georgia Institute of Technology	Neely Nuclear Research
Idaho Nuclear Engineering Laboratory	Idaho Falls
Institute of Nuclear Energy Research	Taiwan
NFS	West Valley
Northeast Utilities	Connecticut Yankee
Northern States Power	Monticello
Omaha Public Power District	Fort Calhoun
Ontario Hydro	Pickering and Bruce
Philadelphia Electric	Peach Bottom 2
Rochester Gas and Electric	R.E. Ginna
Savannah River Operations	
South Carolina Electric & Gas	V.C. Summer
Southern California Edison Company	San Onofre
Union Electric	Callaway
U.S. Ecology	Hanford
Virginia Power	Surry
Wisconsin Electric Power Company	Point Beach 1 & 2

High-Level Waste Shipping

Chem Nuclear	Barnwell, South Carolina
Commonwealth Edison	Dresden
Commonwealth Edison	Quad Cities
Florida Power Corporation	Crystal River
Jersey Central Power and Light Company	Oyster Creek
Maine Yankee	
Northeast Utilities	Millstone
Nuclear Engineering Company	Beatty, Nevada
Rockwell	Atomics International
Southern California Edison Company	San Onofre
Vermont Yankee	

NAC SPENT FUEL TRANSPORTATION EXPERIENCE

NAC has successfully completed over 6 million cask miles of safe spent-fuel transportation. NAC's staff has received more than 60 license amendments for shipment of various fuel types in its casks. Engineering expertise is the most significant component of this licensing experience. NAC successfully licensed its LWT casks for use in a United Nations-sponsored project to remove 209 high enriched uranium fuel from two destroyed research reactors in Iraq and the air shipment of this fuel to a Russian reprocessing facility. This work was done under IAEA contract with Russia's Ministry of Atomic Energy. NAC was responsible for providing the necessary equipment to remove the spent fuel from its location in Iraq, including four (4) NAC-LWT spent fuel shipping casks to transport the fuel, and the necessary licensing documentation to support air shipment of this material.

Since the reactor facilities were destroyed during the Persian Gulf War, the spent fuel could not be removed from the facilities by normal means. NAC developed and supplied the necessary equipment to remove this fuel including a dry transfer system. NAC also supplied the manpower required to perform the fuel removal and cask loading operations in Iraq. This portion of the project was completed one month ahead of schedule.

Since the removal operations involved two air shipments of four loaded casks from Iraq to Russia, the NAC-LWT casks had to be licensed by the Russian Competent Authority for this content and for air shipment. This was the largest amount of spent fuel to ever be airshipped in the world. NAC was able to prepare the necessary licensing documents for these shipments within two months and obtained the appropriate Russian licenses within two additional months in accordance with the initial contract schedule.

NAC has also returned fuel to the United States from Greece and Taiwan. These projects both required engineering ingenuity coupled with solid cask operations personnel. NAC also performs most of the Post-Irradiation Examination spent fuel shipments made in the

TRANSPORT CASK DESIGN/LICENSING EXPERIENCE

The practical experience obtained in the actual handling of casks, the operation of a spent fuel transport cask fleet, and NAC's in-house design and licensing capability have placed NAC in a strong position to design, license and manufacture both transport and storage casks that are reliable, safe and easy to operate. This has been the basis for NAC's success in the design of spent fuel casks.

In 1987, NAC was awarded a contract to design and fabricate a large-capacity rail/barge transport cask (the NAC-CTC) for the U.S. Department of Energy (DOE) Cask Systems Development Program (CSDP). The NAC-CTC was developed by NAC in response to stringent DOE design criteria. The 100-ton cask has a design capacity of 26 pressurized-water reactor (PWR) fuel assemblies. The NAC-CTC is a multiwall design, but it uses high-strength ferritic steel in place of the stainless steel used in other NAC casks for the inner and outer shells. It also uses depleted uranium as the primary gamma shielding material instead of lead.

In 1990, NAC completed the design and licensing of a LWT transport cask (the NAC-LWT cask), meeting the latest NRC and IAEA transportation requirements. Typical of NAC casks, the NAC-LWT cask has a multiwall stainless-steel/lead/stainless-steel body. The NAC-LWT cask can be used to transport one PWR spent fuel assembly, two boiling-water reactor (BWR) spent fuel assemblies or 15 research reactor metallic fuel rods. Five NAC-LWT casks were fabricated and incorporated into the NAC cask fleet described above. The casks have been used for both domestic and international transport of research reactor spent fuel. As stated previously, this is the only U.S.-approved transport cask designed to satisfy 1985 IAEA requirements.

Following completion of the NAC-LWT cask licensing and the design of a number of large storage casks, NAC designed and licensed the first storable transport cask (or dual-purpose cask) for commercial use in the United States, the NAC-STC. The NAC-STC cask, the first in the NAC dual-purpose cask family, has a capacity of 26 PWR fuel assemblies. Transport licensing has included a quarter-scale drop testing program to demonstrate that the cask and its impact limiters perform in accordance with the analyses presented. The NAC-STC transport license was issued by the NRC in September 1994. The basic technology of the NAC dual-purpose cask and its derivatives is described more fully in the following sections.

United States. These shipments include both BWR and PWR fuels and are usually related to the highest performance power reactor fuels in the market at the time of shipment.

In February 1996, NAC completed the loading and shipment of spent nuclear fuel from the Georgia Tech Neely Nuclear Research Center facility in Atlanta to the USDOE Savannah River Site in Aiken, SC. The transfer was conducted in conjunction with requirements of the Atlanta Committee for the Olympic Games. This truck shipment was carried out using a NAC-LWT cask.

FACILITY INTERFACE ASSESSMENT EXPERIENCE

NAC has been selected by DOE in the past to perform facility interface studies of U.S. and foreign commercial reactors. The Facility Interface Capability Assessment (FICA) project was to assess the capabilities of all U.S. commercial nuclear power plants with respect to spent fuel handling, storage and transportation. Phase I performed this assessment with the data already gathered by DOE, its contractors and published sources. However, an accurate assessment could not be made without individual site visits. The actual site visits and data evaluation were performed in Phase II.

The Near-Site Transportation Infrastructure (NSTI) Assessment involved visits to all nuclear sites where spent fuel is currently stored and will, in due course, be accepted by DOE for disposal by the Office of Civilian Radioactive Waste Management. The visits allowed assessment of current fuel cask shipment capability on site and the capability of accessible transportation systems and provisions. The program assessed the potential for upgrading to allow increased cask shipment capability at each site.

NAC began performing studies of cask-reactor spent fuel interface and reactor site transportation mode limitations in 1971. Over the years, NAC has performed over 20 additional studies reviewing interface and transportation capability for various reactors worldwide. In 1980, detailed reports were prepared on all reactors in 17 non-U.S. countries for Sandia Laboratories.

In addition to these formal studies, NAC has performed interface studies in support of each transportation project it has performed. Some involved the most demanding of facility conditions. Projects in Taiwan, Iraq and North Korea presented failed fuel and facility contamination issues in addition to the facility infrastructure limitations to overcome. The success with which each of these projects has been performed testifies to the unique expertise of the NAC transportation professionals in dealing with challenging spent fuel packaging and transportation conditions.

The following table summarizes NAC's NRC transport licenses and COCs.

NRC Licenses and Certificates of Compliance				
Requested by and Granted to NAC				
Cask Designation	COC Number	Number of Revisions/ Application	Status	IAEA Approval
NLI-1/2	9010	35 Transport	Active	Yes
NAC-1/NFS-4	9183	10 Transport	Active	Yes
NLI-10/24	9023	6 Transport	Active	Yes
NAC-LWT	9225	5 Transport	Active	Yes
NAC-I26 S/T	1002	— Storage	Active	N/A
NAC-C28 S/T	1003	— Storage	Active	N/A
NAC-I28 S/T	TSAR Approved	— Storage	Active	N/A
NAC-STC	9235 TSAR Approved	Transport Storage	Active	—

STORAGE CASK DESIGN/LICENSING EXPERIENCE

The casks in the NAC storage series, referred to as the NAC-S/T cask series, utilize essentially identical cask bodies, with different basket disciplines that differ depending on the fuel to be stored. There are three NRC-approved designs in the series—the NAC-I26 S/T cask, the NAC-C28 S/T cask and the NAC-I28 S/T cask. All of the NAC-S/T casks have aluminum baskets and multiwall stainless-steel/lead/stainless-steel cask bodies. All of the casks have been licensed based on fresh fuel enrichment without taking credit for boron or burnup.

The NAC-I26 S/T, the first of NAC's storage cask family, was fully licensed in August 1990. This design can accommodate 26 intact PWR fuel assemblies. One cask of this design has been manufactured for the Almaraz nuclear power plant in Spain.

The NAC-I28 S/T, the second of NAC's storage cask family, was also fully licensed in August 1990. This design can accommodate 28 intact PWR fuel assemblies. Two casks of this design have been manufactured and are currently in service at Virginia Power's Surry Independent Spent Fuel Storage Installation (ISFSI).

The NAC-STC cask has been designed and licensed to satisfy the requirements of 10CFR72 for storage and 10CFR71 for transport. In September 1994, the NRC issued a transportation COC to NAC for the nation's first storable dry spent fuel transport cask (NAC-STC), also called a dual-purpose or multipurpose cask. The certificate was the first of a two-license approval process. The second license, a storage approval, was received in July 1995.

The design, development and licensing of the NAC-STC is a result of NAC's extensive spent fuel storage and transport experience. After successfully licensing casks separately for storage and transport, NAC utilized its design and licensing experience to develop a cask that combines both functions. The dual-purpose cask can be used for interim spent fuel storage at reactor sites, followed by spent fuel transport, without having to return the cask to the spent fuel pool—eliminating additional handling of the fuel prior to final disposal. Storage and transport can be repeated as many times as necessary. The cask can also be considered as the means for direct fuel disposal in a geologic repository. The first dual-purpose cask has a capacity of 26 PWR fuel assemblies.

NRC storage licenses and COCs are listed in the preceding table.

Based on the flexibility of the basic multiwall design used in both the NAC-S/T and NAC-STC casks, a range of spent fuel storage and transport system applications and design derivatives has been developed.

SPENT FUEL TRANSFER SYSTEMS

For more than 10 years NAC has designed, fabricated, tested and operated a variety of Dry Transfer Systems (DTS's) to transfer spent nuclear fuel from facilities with limited crane capabilities or limiting accesses and features to IAEA and NRC licensed spent fuel transport casks or vice-versa. These DTS's have been operated in diverse environments in the United States and throughout the world and have proven to be a significant enhancement in transferring fuel between spent fuel pools, dry storage and hot cell facilities and spent fuel transport casks. Over the years, NAC has successfully and safely transferred well in excess of 2,000 fuel assemblies in DTS's.

Our latest-generation DTS incorporates years of extensive design and operating experience and consists of a transfer cask with integrated fuel canister grapple, fuel canisters, and facility and cask adapters as well as a complement of related tools and equipment. The transfer cask is used to move irradiated fuel onsite in those instances where direct loading or unloading of the shipping cask is not possible due to dimensional, weight or other restrictions. The transfer cask is used to move canisters of fuel from the fuel storage location to the shipping cask. Adapters are employed to ensure proper interfacing of the transfer cask with fuel storage locations and shipping casks (NAC-LWT and NLI-1/2). Our existing fuel storage location adapter is designed for use with a storage pool; however, site or equipment specific adapters can easily be developed to allow interfacing with virtually any storage facility.

Prior to movement of the first fuel canister in the transfer cask, the shipping cask is prepared for loading by proper set up of the base plate, shipping cask and shipping cask adapter. The fuel canisters are loaded with fuel and then retracted into the transfer cask via the fuel storage location adapter. The transfer cask is then moved to the shipping cask. The loaded transfer cask is then placed upon the adapter and the fuel canister is transferred into the cavity of the shipping cask. This operation is repeated until the shipping cask is completely loaded. Once complete, the shipping cask is prepared for shipment in the normal manner. One significant advantage of utilizing this technology is the minimization of cask decontamination efforts which are typically time consuming following wet loading.

DTS equipment has been used with research reactor and MTR fuel assemblies at facilities in Taiwan, Iraq and Greece over the past several years. The handling of canistered fuel has enabled NAC to standardize the canister handling equipment and transfer system. The entire process has proven to be a straightforward and direct approach in resolving facility interface problems in the spent fuel transportation arena. NAC also performed DTS operations at the Neely Nuclear Research Center on the Georgia Tech campus in February 1996 and will perform a DTS demonstration at Brookhaven's High Flux Beam Reactor this month (May 1996).

QUALITY ASSURANCE

NAC has established a total quality assurance program implemented by our Quality Assurance Manual. The manual includes the 18 basic elements to meet the requirements of 10CFR71, Subpart H; 10CFR72, Subpart G; Reg. Guide 7.10 and NQA-1. The program is applied using a *graded approach* as defined in appendix A of Reg. Guide 7.10.

The NAC Quality Assurance Program is specified in the NAC Quality Assurance Manual (QAM), Rev. 5, dated February 15, 1995. It implements the specific quality policy as specified in the Corporate Policy and Procedures Manual, together with corporate policies in the manual and the Engineering Procedures Manual (EPM). The QAM was approved by the NRC on March 7, 1995, approval number 0018, expiring on December 31, 1999.

The manual has received approval from the NRC for use in the design, fabrication and operation of radioactive material packages. A copy of the approval certification is included in the Quality Assurance Manual. Audits of NAC's quality assurance program by U.S. utilities, DOE, Westinghouse and others have consistently found that the program not only follows the letter of the Quality Assurance Manual but, most important, its implementation and practice are a part of NAC's corporate culture.

NAC's Quality Assurance Program and program plans are managed by the Director, Quality Assurance, who reports directly to the President and CEO. The Director, Quality Assurance has the authority, within the Quality Assurance Program, to take actions consistent with quality and safety independent of any other part of the NAC organization.

May 28, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Avenue SW
HR - 561.21
Washington, D.C. 20585

Reference: Request for Expression of Interest regarding OCRWM Transportation
Plan; PSA #1602 May 24, 1996

Dear Ms. Miskinis,

Newport News Nuclear is formally acknowledging our interest in the above
referenced plan. We are presently evaluating our relevant experience and will be
prepared to respond to future draft documents.

Thanking you in advance for adding Newport News Nuclear to your mailing list.

Sincerely,



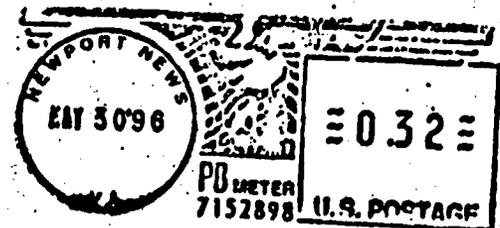
Arlene B. Selber
Vice President

Arlene B. Selber

*Newport News Nuclear
Division of
Newport News Shipbuilding
4101 Washington Avenue
Newport News, Virginia 23607 2770*

TENNECO

**Newport News
Shipbuilding**



**Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Avenue SW
HR - 561.21
Washington, D.C. 20585**





May 29, 1996
WJM-96-013

①

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave. SW
Attention: HR-561.21
Washington, DC 20585

Subject: Expression of Interest in DOE Waste Acceptance, Storage, and
Transportation Services

Reference: FR Notice Doc. 96-13244, Filed 5/24/96, Published 5/28/96

Dear Ms. Miskinis:

Sierra Nuclear is interested in receiving additional information related to the DOE's plan to procure waste acceptance, storage, and transportation services. Sierra Nuclear is primarily involved in designing, licensing, and fabricating spent fuel storage and transportation components. It is requested that we be added to the DOE list to receive additional information, including any draft solicitation documents.

We are reviewing the Federal Register Notice and it is anticipated that comments on the notice will be submitted under separate cover.

Thank you for the opportunity to express our interest in the planned DOE solicitation.

Very truly yours,

William J. McConaghy
Director of Business Development



Victor Square
Cott Valley, California 95066



Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Attention: HR-561.21



Inc.

5

FACSIMILE COVER SHEET

TO: Michelle Miskinis

FAX#: 202-634-4419

Verification Phone Number: (202)785-2635

FROM: Marilyn Meigs

DATE: 6-18-96

Number of Pages (Including cover sheet) 5

Verification Requested: YES NO

Hard Copy to Follow: YES NO

Please call Verification Phone Number if you have any problems with this transmission.

SUBJECT/COMMENTS: The original is being sent over this morning by a courier.

WASHINGTON, DC OFFICE
1776 Eye Street, NW, Suite 750 Washington, DC 20006
Telephone: (202)785-2635 • Fax: (202)785-4037

Inc.

14 June 1996

1776 Eye Street, N.W., Suite 750
Washington, D.C. 20005-3700
Tel: (202) 785-2635
Fax: (202) 785-4037

Ms. Michelle Miskinis
Contracting Officer,
U. S. Department of Energy
1000 Independence Avenue, SW
Attention: HR-561.21
Washington, DC 20585

Dear Ms. Miskinis:

Notice of Waste Acceptance, Storage, and Transportation Services

The following text represents BNFL's response to DOE's Request for an initial Expression of Interest in Waste Acceptance, Storage, and Transportation Services, Federal Register, May 28, 1996 (Volume 61, Number 103)) [Notices] [Page 26508-26509]

TITLE: Waste Acceptance, Storage, and Transportation Services

INTRODUCTION

British Nuclear Fuels plc (BNFL) is a public limited company with an international reputation and proven capability in the manufacture of nuclear fuel products and the transport and reprocessing of spent fuel, as well as the safe treatment, storage, and transportation of radioactive wastes. While its sole shareholder is the UK Government, BNFL operates on a commercial basis, offers competitive pricing for its services, and produces an annual report available to the public. The Company is committed to long-term investment in leading edge technology and continues to forge international links within the scientific and nuclear industry community.

BNFL Inc. is a wholly owned subsidiary of BNFL plc. and has experience in doing business with DOE and US utilities since its inception in 1990.

BNFL's experience in handling, treating, processing, storing, and transporting spent fuel is directly applicable to the US program for Civilian Radioactive Waste Management.

In particular, BNFL's capabilities in the transport of spent fuel around the world over the last 25 years can be made available for the US program of spent fuel transport referenced in DOE's Notice.

It has been demonstrated that major national and international programmes of spent fuel shipment can be successfully operated by companies in the commercial sector. BNFL supports the efforts of USDOE to secure interest from the commercial sector for Waste Acceptance, Storage, and Transportation Services.

BNFL'S EXPERIENCE

Overview

To complement its other fuel-cycle services, BNFL has established a comprehensive transport service for radioactive materials. The company has developed the skill and resources to transport all radioactive materials arising in any section of the nuclear fuel cycle, from fuel products to spent fuel, plutonium and waste. The principal transport operations are managed by BNFL's Transport Division.

Transport of Spent Fuel

BNFL has over 25 years experience shipping spent fuel domestically and worldwide by land and by sea. To date more than 9,000 tonnes of spent fuel have been transported by BNFL or its subsidiary/associated companies to the UK and French reprocessing plants. In addition small quantities of test reactor fuel have been shipped to the USA over a period of 12 years.

BNFL's principal shipping service is operated through its subsidiary company Pacific Nuclear Transport Limited (PNTL). BNFL provides the management and technical resources to PNTL and holds a 62.5% share holding. PNTL is by far the largest spent fuel transport operator in the Western world and the company owns 5 purpose-built nuclear fuel carriers and 150 casks for the transport of spent fuel from Japan to Europe. BNFL/PNTL ships have completed more than 175 voyages from Japan and mainland Europe, covering three million nautical miles without any incident involving a breach of cask containment or loss of integrity.

A further purpose-built vessel is owned solely by BNFL and is currently operated for deliveries of spent fuel from European utilities. From mainland Europe, BNFL also uses road and rail services.

To complement its existing range of casks and to meet the requirements for the transport in the 1990s of the higher burn-up fuels that are increasingly becoming the trend, BNFL has designed and licensed two special cask designs which comply with the latest (1985) IAEA transport regulations for such fuels.

Transport of Radioactive Waste

Within the UK, BNFL operates transport services for radioactive materials and waste byproducts from the various fuel-cycle production facilities and the nuclear reactors owned by the company. BNFL also receives low and intermediate level waste from UK customers for storage and disposal and is involved in associated transport operations.

BNFL has designed and licensed a cask to meet the requirements for return of vitrified high-level waste from reprocessing activities.

To cover its activities at the front end of the fuel cycle, BNFL is a transporter in its own right with its own prime movers and a variety of standard and purpose-designed containers. BNFL delivers to the majority of European countries as well as to the USA, Russia and Japan. It makes use of road, rail, air and sea transport. In all, the front-end transport movements involve some 4,000 journeys carrying over 15,000 tonnes of uranic products per year.

Interim Storage

To ensure that its portfolio continues to match customers' needs, BNFL has entered the Interim Storage market with a number of products and services. An agreement is in place with Sierra Nuclear Corporation [USA] on the marketing of their VSC and TranStor™ spent fuel storage systems. Sierra Nuclear is a well-established and successful US company with a number of contracts for its products.

BNFL also has the capability to design and supply all-metal casks for the transport and storage of spent fuel and vitrified high-level waste (VHLW). The handling, transport and storage of VHLW is a rather specialised activity; BNFL is one of the very few companies possessing the necessary hardware plus relevant design and engineering expertise.

Cask Maintenance Facilities

BNFL has designed, constructed and operates two purpose-built cask maintenance facilities at Sellafield to perform cask maintenance on a periodic basis under fully approved quality control and assurance programmes.

Licensing, Support Services & Quality Assurance

All transport operations are carried out according to regulations promulgated by the International Atomic Energy Agency (IAEA). BNFL has a central container approval service which has many years experience of securing Approval Certificates and validations for a variety of radioactive material packages. This includes the preparation of Design Safety Reports and the submission of applications to the UK and overseas regulatory bodies.

During its transport services BNFL provides full technical support to reactor operators, especially in the introduction of a cask to a reactor, on-going technical advice on fuel to cask loading and cask preparation for despatch. BNFL also provides design and technical support services to reactor operators to assist in ship and cask handling at the utility sites.

All stages of the transport operations are subject to Quality Assurance control to meet local regulatory requirements in accordance with IAEA Regulations and those of the reactor operator.

Emergency Response

BNFL has established a world wide emergency response capability which enables BNFL to respond rapidly to any incident involving casks in transit. The procedures are tested, and where necessary revised, by periodic exercises involving not only BNFL personnel but also personnel from local authorities, emergency services, sub-contractors, press etc.

BNFL has for many years now operated an internationally recognised comprehensive public information programme in support of its fuel-cycle activities with particular emphasis on waste transportation, storage, processing and disposal. The programme includes publications, public presentations, a Visitors' Center close to the Sellafield reprocessing plant, and liaison committees with local government and other interested parties to explain the nature of the operations and the safety precautions taken. Support is given to overseas customers, and other industries are now recognising the value of the program established by BNFL. In particular, BNFL conducts a programme of initiatives local to its private marine terminal to protect its transport operations.

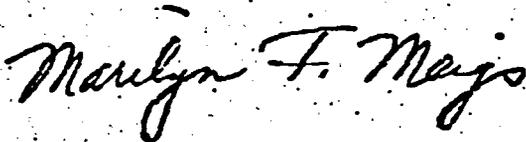
SUMMARY

- BNFL has extensive experience, and is the world leader, in the transport of radioactive materials (including spent fuel and radioactive waste) by road, rail, sea and air. BNFL and its subsidiary own a fleet of six purpose-built ships and more than 150 spent fuel casks which have been used for transporting spent fuel worldwide for more than 25 years.

- BNFL already has considerable experience of managing joint ventures in a number of transport areas, including sea and land transport between Japan and Europe and within Europe.

This Expression of Interest, submitted on behalf of BNFL, is intended to provide an overview of BNFL's capabilities relevant to the OCRWM's requirements for commercial involvement in waste acceptance, storage and transportation. BNFL can provide further details on its capabilities as the US program unfolds and more information is forthcoming, and is willing to discuss alternative proposals for our successful execution of the program.

Yours sincerely,



Marilyn F. Meigs
Vice President



Edlow International Company
1666 Connecticut Ave., N.W., Suite 201
Washington, D.C. 20009 U.S.A.
Tel (202) 483-4959
Fax (202) 483-4840
e-mail: edlowco@aol.com

June 11, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Avenue, S.W.
Attn: HR-561.21
Washington, D.C. 20585

**Reference: Expression of Interest for Office of Civilian
Radioactive Waste Management Transportation Plan**

Dear Ms. Miskinis:

Edlow International Company (EIC) is pleased to respond to your request for Expressions of Interest and Comments on the Office of Civilian Radioactive Waste Management Transportation Plan. We look forward to working with the Department of Energy and utilities to accomplish the important national goals inherent in this program.

A U.S. owned and operated small business, EIC provides a full spectrum of services in transportation management and materials procurement spanning the entire nuclear fuel cycle - from concentrates, enriched product, and fuel assembly handling to spent fuel transfers. EIC serves more than 100 clients in 50 countries on six continents. This broad experience base, coupled with Edlow's track record of innovative "firsts" in nuclear material transport, import/export, and licensing, has ensured client success and satisfaction.

Transporting spent fuel requires technical expertise as well as political sensitivity. EIC's extensive experience in transportation and regulatory issues makes it uniquely qualified to serve the emerging need for transport of spent fuel. EIC is the leader in the return of used fuel from foreign research reactors to the Department of Energy and has been responsible for more

shipments of this type than any other company (including spent fuel shipments delivered to the Department in 1995).

Edlow has over 39 years of experience with the packaging and transportation of radioactive materials and managed the first shipment of spent fuel under the "Atoms for Peace Program" in 1963. EIC has been involved in the design, licensing and fabrication of spent fuel casks since the 1950's.

EIC's services span the full range of packaging, transport, regulatory, training and community relations concerns. They include:

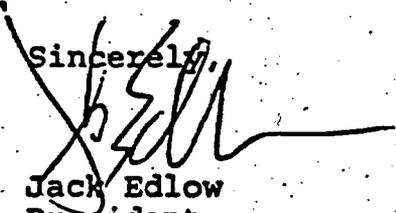
- * Determining the most direct, secure and cost-effective transportation modes and carriers;
- * Arranging specially-chartered trucks, rail cars, and ships to transport spent fuel;
- * Coordinating shipments with national, state and local authorities;
- * Providing technical assistance and monitoring at the reactor site in advance of the shipment, and during cask loading, tie-down and transport.
- * Cooperating with shippers and carriers to ensure safe packaging and handling;
- * Obtaining regulatory approvals for packaging;
- * Providing casks, basket design and fabrication of this and other related equipment;
- * Handling all required notifications and licenses;
- * Managing all shipping documentation, tracking and logistics;
- * Providing emergency response planning;
- * Developing a Transportation Program and Transport Plan which will include aspects such as:
 - Project Management and Organization;
 - Physical Protection;

- Quality Assurance;
- Financial Management.

- * Overseeing the entire process to meet critical deadlines and ensuring safe, secure and cost-effective delivery.

EIC is willing to employ these skills for the Department and to participate in the Office of Civilian Radioactive Waste Management's program at any of several levels. We would be pleased to provide further information on our capabilities; please do not hesitate to contact us at (202) 483-4959 in this regard.

Sincerely,



Jack Edlow
President

SUITE E, 4193 CRESCENT DRIVE
ST. LOUIS, MISSOURI 63129
☎ (314) 892-8383
TOLL FREE (800) 532-0504
FAX (314) 892-7899

May 30, 1996

United States Department of Energy
1000 Independence Avenue S.W.
Attn: HR - 561.21
Washington, D.C. 20585

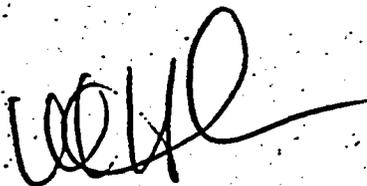
Attention: Ms. Michelle Miskinis

Dear Ms. Miskinis:

Please use this letter as a submission of interest by RSB Logistic Inc. for transporting spent nuclear fuel from commercial nuclear reactors to the future designated Federal facility for storage.

Please also find enclosed company literature for RSB Logistic Inc., and please feel free to contact me if you have any questions.

Sincerely,



William Hehr
Operations Supervisor

enclosures

SASKATOON, SK

ST. LOUIS, MO

KINGSTON, ON

SPOKANE, WA

MONTREAL, PQ

10

IES Utilities Inc.
800 First Street S.E.
P.O. Box 351
Cedar Rapids, IA 52406-0351
Telephone 319 398 4411



June 14, 1996
NG-96-1347

Ms. Michelle Miskinis
Contracting Officer
US Department of Energy
1000 Independence Avenue SW
Attention: HR-561.21
Washington, DC 20585

Re: Duane Arnold Energy Center
Subject: Expression of Interest
File: J-70a

Dear Ms. Miskinis:

This letter is in response to the notice in the Federal Register of May 28, 1996.

In that notice, the Office of Civilian Radioactive Waste Management (OCRWM) requested expressions of interest related to proposed approach for carrying out its spent nuclear fuel acceptance, transportation and storage functions. IES Utilities, acting with other subsidiaries of IES Industries, has potential interest in participating in this program.

Please keep us apprised of developments and opportunities to participate. My telephone number is (319) 398-4669 and fax number is (319) 398-8192.

Sincerely,

Walter C. Nodéan

Dr. Walter C. Nodéan
Principal Engineer, Nuclear Fuel

cc: J. Franz
B. Lacy
B. Wohlers

WCN/kd

 **RSB LOGISTIC INC.**

SUITE E, 6193 CRESCENT DRIVE
ST. LOUIS, MISSOURI 63129
P (314) 892-8383
TOLL FREE (800) 832-0504
FAX (314) 892-7899

May 30, 1996

United States Department of Energy
1000 Independence Avenue S.W.
Attn: HR - 561.21
Washington, D.C. 20585

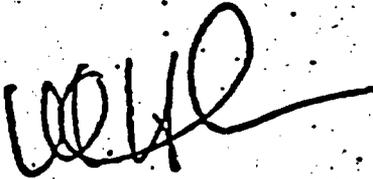
Attention: Ms. Michelle Miskinis

Dear Ms. Miskinis:

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Please also find enclosed company literature for RSB Logistic Inc., and please feel free to contact me if you have any questions.

Sincerely,



William Hehr
Operations Supervisor

enclosures

RSB LOGISTIC INC.

11

SUITE E, 4193 CRESCENT DRIVE
ST. LOUIS, MISSOURI 63129
☎ (314) 892-8383
TOLL FREE (800) 532-0504
FAX (314) 892-7899

RSB LOGISTIC INC. (formerly BRAUNKOHLER TRANSPORT) is the North American subsidiary of a worldwide Transportation Company.

RSB LOGISTIC GMBH is the parent Company with its head office near Cologne in Germany. RSB has subsidiaries in several countries and handles many facets of transportation throughout the world. These include inland waterways shipping in Europe, nuclear transportation both domestic and overseas, freight forwarding services, warehousing and storage and road transport of refrigerated and bulk materials in Germany and the European Community.

RSB LOGISTIC GMBH is, in turn, a subsidiary of the "RHEINBRAUN" group of companies based in Germany. This group is headed by a holding company which is **RWE Ag.**, which has many subsidiaries including **RHEINISCH WESTFALISCHES ELEKTRIZITATSWERK** which is one of the largest electrical utility companies in Germany. **RWE** and its subsidiaries have in excess of 120,000 total employees worldwide. These companies are involved in such varied areas as coal, gold and uranium mining, printing press manufacturing, marketing of natural resources, refineries and conversion facilities along with numerous other ventures and activities.

The names of "**RSB LOGISTIC**", "**BRAUNKOHLER**" and "**RHEINBRAUN**" are well respected and well known in the European community and worldwide. We at "**RSB LOGISTIC**" in North America are proud of this reputation and are continuing to preserve it.

SASKATOON, SK

ST. LOUIS, MO

KINGSTON, ON

SPOKANE, WA

MONTREAL, PQ

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION



**HAZARDOUS MATERIALS
CERTIFICATE OF REGISTRATION**

Registrant: RSB LOGISTIC SERVICES INC.
Attn: Mike Montague
4193 Crescent Drive Ste. E
St. Louis, MO 63129-1084

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of Section 106(c)(1) of the Hazardous Materials Transportation Act, 49 App. U.S.C. 1801, et. seq. It is unlawful to alter or falsify this document.

Reg. No: 060895 028 004D Issued: 06/12/95 Expires: 06/30/96

Recordkeeping Requirements for the Registration Program

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (1) A copy of the registration statement filed with RSPA; and
- (2) This Certificate of Registration.

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U.S. Department of Transportation upon request.

Each motor carrier (private or for-hire) subject to the registration requirement must keep a copy of that carrier's current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, DHM-60 Research and Special Programs Administration, U.S. Department of Transportation, 400 Seventh Street, SW, Washington, DC 20590, telephone (202)366-4109.

11 April 1994

To Whom It May Concern

Braunkohle Transport, is presently in the process of undertaking a complete review of the current quality practices, and identifying the main steps which Braunkohle Transport can adopt within its operations, focusing on streamlining and improving the existing quality practices.

Braunkohle Transport is presently in the process of assessing all critical aspects of their current operations as they relate to the quality of the services, and to develop and implement a globally recognized Quality Assurance System in accordance with ISO 9002 Quality Assurance requirements.

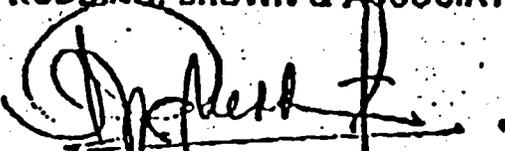
The objectives are that Braunkohle Transport should be able to organize itself in such a way that the technical, administrative and human factors affecting the quality of its services will be under control.

By implementing the applicable ISO 9002 Quality Assurance System Elements throughout all stages of their organization, Braunkohle Transport feels that their customers' requests can be met with the first effort, every time, in every section and by every person within the organization.

Braunkohle Transport has engaged the professional services of Kudding, Brown & Associates Inc., to assist them with the development, implementation and registration of the ISO 9002 Quality Assurance System.

We anticipate that the ISO 9002 Quality System Standard requirements will be fully implemented and registered by the end of June, 1994.

Yours truly,
KUDDING, BROWN & ASSOCIATES INC.



**Richard E. Kudding, CQSA, B.Sc.
President**

RECEIVED MAR 0 8 1995

INTERSTATE COMMERCE COMMISSION

DECISION

MC-188479

SERVICE DATE

MAR. 1 1995

BRAUNKOHLER TRANSPORT CANADA, INC.
SASKATOON, SK, CD

Reentitled

RSB LOGISTIC INC.
SASKATOON, SK, CD

Decided: February 21, 1995

On February 13, 1995, applicant filed a request to have the Commission's records changed to reflect a name change.

It is ordered:

The Commission's records are amended to reflect the carrier's name as RSB LOGISTIC INC.

If it has not already done so, the carrier must amend (1) its insurance coverage for the protection of the public, (2) its designation of agents upon whom process may be served, and (3) its tariffs of schedules to reflect the new name.

By the Commission.

Vernon A. Williams
Secretary

(SEAL)

INTERSTATE COMMERCE COMMISSION

PERMIT

No. MC-188479*

SERVICE DATE

NOV 12 1985

BRAUNKOHLÉ TRANSPORT CANADA, INC.
MONTREAL, QUEBEC, CANADA

This Permit is evidence of the carrier's authority to engage in transportation as a contract carrier by motor vehicle.

This authority will be effective as long as the carrier maintains compliance with the requirements pertaining to insurance coverage for the protection of the public (49 CFR 1043); the designation of agents upon whom process may be served (49 CFR 1044); the execution of contracts (49 CFR 1053)*; and for passenger carriers, tariffs or schedules (49 CFR 1300 through 1310

This authority is subject to any terms, conditions, and limitations as are now, or may later be, attached to this privilege.

The transportation service to be performed is described on the reverse side of this document.

By the Commission.

(SEAL)

Noreta R. McGee
Secretary

*While the execution of contracts must be accomplished, it is unnecessary to file them with the Commission.

NOTE: If there are discrepancies regarding this Permit, please notify the Commission within 30 days.

No. MC-188479*

To operate as a contract carrier, by motor vehicle, in interstate or foreign commerce, over irregular routes, transporting general commodities (except classes A and B explosives and household goods), between points in the United States (except Hawaii), under continuing contract(s) with commercial shippers or receivers of such commodities.

*This permit cancels Permit No. MC-188479, issued October 31, 1986.

INTERSTATE COMMERCE COMMISSION

CERTIFICATE

No. MC 188479 (Sub 2)

BRAUNKOHLER TRANSPORT CANADA, INC.
MONTREAL QUEBEC, CD

This Certificate is evidence of the carrier's authority to engage in transportation as a common carrier by motor vehicle.

This authority will be effective as long as the carrier maintains compliance with the requirements pertaining to insurance coverage for the protection of the public (49 CFR 1043); the designation of agents upon whom process may be served (49 CFR 1044); and tariffs or schedules (49 CFR 1312). The carrier shall also render reasonably continuous and adequate service to the public. Failure to meet these conditions will constitute sufficient grounds for the suspension, change, or revocation of this authority.

This authority is subject to any terms, conditions, and limitations as are now, or may later be, attached to this privilege.

For common carriers with irregular route authority: Any irregular route authority authorized in this Certificate may not be tacked or joined with your other irregular route authority unless joinder is specifically authorized.

The transportation service to be performed is described on the reverse side of this document.

By the Commission.

SIDNEY L. STRICKLAND, JR.
Secretary

(SEAL)

NOTE: If there are any discrepancies regarding this document, please notify the Commission within 30 days.

To operate as a common carrier, by motor vehicle, in interstate or foreign commerce, over irregular routes, transporting general commodities (except classes A and B explosives, household goods, and commodities in bulk), between points in the U.S. (except AK and HI).

TCF TOWER-CHISHOLM FERGUSON LIMITED

ESTABLISHED 1928
CERTIFICATE OF INSURANCE

2 LANSING SQUARE
SUITE 901
WILLOWDALE, ONTARIO
CANADA M2J 4P8
TEL. (416) 495-0463
FAX (416) 495-7274

This Certificate of Insurance neither affirmatively nor negatively amends, extends or alters the coverage afforded by the policies scheduled herein. It is furnished as a matter of information only, confers no rights upon the holder and is issued with the understanding that the rights and liabilities of the parties will be governed by the original policies as they may be lawfully amended by endorsement from time to time.

NAME AND ADDRESS TO WHOM ISSUED:

NAME AND ADDRESS OF INSURED:

RSB LOGISTIC INC./RSB LOGISTIQUE INC.
219 Cardinal Crescent
Saskatoon, Saskatchewan, S7K 7K8

TYPE OF INSURANCE:

1. Blanket Automobile Fleet 2. Commercial General Liability

INSURER:

Zurich Ins Co - International

POLICY NUMBER:

1. 9990934 2. 8826344

EXPIRY DATE:

05/31/96

COVERAGES:

1. Automobile - Third Party Property Damage, Bodily Injury - Physical Damage/All Perils \$2500 Ded (Tractors)
2. C.G.L. - Third Party Property Damage, Bodily Injury and Personal Injury.

LIMITS OF LIABILITY

1. \$ 10,000,000. 2. \$10,000,000.

(ALL LIMITS ARE IN CANADIAN DOLLARS)

DESCRIPTION OF OPERATIONS/COMMENTS: All operations of the Insured common to long haul trucking, interprovincial/interstate common carrier including transportation of hazardous materials.

THE UNDERSIGNED HEREBY CERTIFIES THAT THE ABOVE POLICY(S) ARE NOW IN FORCE.

DATE:

#29

TOWER-CHISHOLM FERGUSON LTD.

Cheryl Dillon
Authorized Signature

CERTIFICATE OF INSURANCE

This Certificate of Insurance neither affirmatively nor negatively amends, extends or alters the coverage afforded by the policies scheduled herein. It is furnished as a matter of information only, confers no rights upon the holder and is issued with the understanding that the rights and liabilities of the parties will be governed by the original policies as they may be lawfully amended by endorsement from time to time.

NAME AND ADDRESS TO WHOM ISSUED:

NAME AND ADDRESS OF INSURED:
RSB LOGISTIC INC./RSB LOGISTIQUE INC.
219 Cardinal Crescent
Saskatoon, SK S7L 7K8

TYPE OF INSURANCE: Inland Transit (Cargo)

INSURER: Zurich Ins Co - International

POLICY NUMBER: 8826405

EXPIRY DATE: January 5, 1997

LIMITS OF LIABILITY \$ 1,350,000. CDN \$
\$ 1,000,000. U.S.\$

DESCRIPTION OF OPERATIONS/COMMENTS:
Operations usual to the Named Insured.

THE UNDERSIGNED HEREBY CERTIFIES THAT THE ABOVE POLICY(S) ARE NOW IN FORCE.

TOWER-CHISHOLM FERGUSON LTD.

DATE:

Chester Wilson

Authorized Signature

Cert: 11



U.S. Department
of Transportation
Federal Highway
Administration

RECEIVED JUN 6 1991

400 Seventh St. S.W.
Washington, DC. 20590

MAY 15, 1991

IN REPLY, REFER TO:
YOUR USDOT NO.: 266723
REVIEW NO.: 00106114

BRAUNKOHLE TRANSPORT CANADA INC.
2902 HANSELMAN AVENUE
SASKATOON, SK S7L5Z3

GENTLEMEN:

THE MOTOR CARRIER SAFETY RATING FOR YOUR COMPANY IS:

SATISFACTORY

THIS SATISFACTORY RATING IS THE RESULT OF A MAY 01, 1991, REVIEW AND EVALUATION. A SATISFACTORY RATING INDICATES THAT YOUR COMPANY HAS ADEQUATE SAFETY MANAGEMENT CONTROLS IN PLACE TO EFFECT SUBSTANTIAL COMPLIANCE WITH THE FEDERAL MOTOR CARRIER SAFETY AND/OR HAZARDOUS MATERIALS REGULATIONS:

ALL PARTS OF THE REGULATIONS WERE CONSIDERED SATISFACTORY

PLEASE ASSURE YOURSELF THAT ANY SPECIFIC DEFICIENCIES IDENTIFIED IN THE REVIEW REPORT HAVE BEEN CORRECTED. WE APPRECIATE YOUR EFFORTS TOWARD PROMOTING MOTOR CARRIER SAFETY THROUGHOUT YOUR COMPANY. IF YOU HAVE QUESTIONS OR REQUIRE FURTHER INFORMATION, PLEASE CONTACT THE SAFETY SPECIALIST WHO CONDUCTED THE REVIEW.

Sam W. P. Rea, Jr.

SAM W. P. REA, JR.
CHIEF, FEDERAL PROGRAMS DIVISION

- SEE MESSAGE ON BACK -

NOW DOING BUSINESS AS:

RSB LOGISTIC, INC.
219 CARDINAL CRESCENT
SASKATOON, SASKATCHEWAN S7L 7K8

**CHEM-NUCLEAR SYSTEMS, INC.**

140 Stoneridge Drive • Columbia, South Carolina 29210 • (803) 256-0450

June 16, 1996

Ms. Michelle Miskinis, Contracting Officer
U.S. Department of Energy
1000 Independence Ave. SW
Attn: HR-561.21
Washington, DC 20585

Dear Ms. Miskinis

**SUBJ: REQUEST FOR EXPRESSION OF INTEREST AND COMMENTS
REGARDING OFFICE OF CIVILIAN RADIOACTIVE WASTE
MANAGEMENT TRANSPORTATION PLAN POC**

This is to inform you that Chem-Nuclear Systems, Inc. (CNSI) is interested in obtaining future information regarding the potential contract discussed in the subject request for expressions of interest. Chem-Nuclear is highly qualified to perform this type of work, as shown in the enclosed company brochure.

Our comments on the scope of services and contract are as follows:

1. Transportation service contractors and individual purchasers may have problems reaching agreement on methods and schedule for servicing specific utility sites under a fixed-price scenario. The contractor will be motivated to service the contract under the lowest cost, whereas the utility prefers the contractor to deliver a service that best suits that particular utility. What would happen if the contractor and utility cannot agree to terms?
2. The level and type of service should be specified in the contract between the contractor and DOE should be specified. This will enable the contractor to cost into his quote the appropriate service.
3. Costing the service for the quotation would be simplified if there were a standardized canister or interface for each utility within each region. It would be to the contractor's advantage to develop such a canister, but will be difficult to do in the time allowed, or if some utilities within the region already have storage-only systems.
4. Purchasers have no incentive to construct physical plant modifications or perform technical specification changes that would improve efficiency or reduce costs for the contractor. This was an advantage for DOE performing the design of the standardized MPC; there was no incentive for the utilities to do it.

Thank you for providing us the opportunity to comment on this potential procurement. If you have any questions of CNSI, please contact me at (803)758-1890.

Sincerely,



Charles R. Witt
Principal Engineer

A23:LTR2

Mail-o-gram 

STAHL INDUSTRIES, INC.
~~2000 East Central Blvd.~~
Youngstown, Ohio 44503

FOR D.O.E. ATTN 561.21

PLEASE SEND ADDITIONAL INFORMATION AND PLACE
ON LIST FOR FURTHER SUBMISSION OF "NOTICE OF
WRITE ACCEPTANCE, STORAGE AND TRANSPORTATION
SERVICES" WE WANT TO PARTICIPATE.

SEND TO —

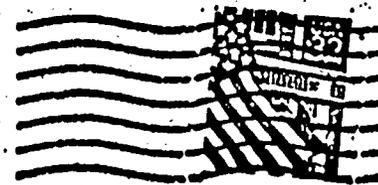
Stahl Industries, Incorporated
530 East Central Boulevard
Suite 1504
Orlando, Florida 32801

Paul S. Stahl
President
5-30-96

13

Stahl INDUSTRIES, INC.

Stahl Industries, Incorporated
530 East Central Boulevard
Suite 1504
Orlando, Florida 32801



MICHELLE MISKINIS, CONTRACTING OFFICER
U.S. DEP. OF ENERGY
1000 INDEPENDENCE AVE SW
WASHINGTON, D.C. 20585

ATTN: HR 561.21





B&W Nuclear Environmental Services, Inc.

■ McDermott company

P.O. Box 10548
Lynchburg, VA 24506-0548
(804) 948-4600
Fax: (804) 948-4846

May 31, 1996

Ms. Michelle Miskinis
Contracting Officer
US Department of Energy
1000 Independence Ave., SW
Attn.: HR-561-21
Washington, D.C. 20585

**Subject: Request for Expression Of Interest and Comments
Regarding Office of Civilian Radioactive Waste
Management Transportation Plan**

Dear Ms. Miskinis:

The Babcock & Wilcox Co. has been a supplier of nuclear steam supply systems to the electric power industry for over thirty years and has built, owned and operated research reactor and critical experiment facilities. It is currently the sole supplier of nuclear fuel assemblies to the U.S. Navy and has provided fuel to electric utilities and research facilities. B&W under DOE contract DE-AC07-88ID 12701 designed, licensed and built the BR-100; a 100 ton barge/rail cask capable of shipping 21 PWR or 54 BWR fuel assemblies. In support of these operations, current employees of B&W Nuclear Environmental Services, Inc. (B&W NESI) have developed significant skills in radiological program management, exposure control, licensing, transportation and waste disposal.

These capabilities are available to assist OCRWM in providing project engineering, site management, transportation, system integration and other services pertaining to the full spectrum of spent fuel management. With this experience in mind, we would like to have B&W NESI added to your mailing list for the above referenced draft solicitation when it becomes available for review. We would also like a copy of the names and addresses of those companies that respond to this expression of interest.

Any statement of work, conference registration forms, or other relevant material pertaining to this subject should be sent to my attention at the following address:

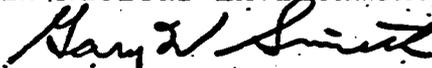
Mr. Gary W. Smith
B&W Nuclear Environmental Services, Inc.
P.O. Box 10548
2220 Langhorne Plaza
Lynchburg, VA 24506-0548

Ms. Michelle Miskinis
Contracting Officer

2

In the interim, if I can be of any assistance in addressing other environmental issues, please do not hesitate to call me at your convenience. I can be reached at (804) 948-4605.

Sincerely,
B&W Nuclear Environmental Services, Inc.



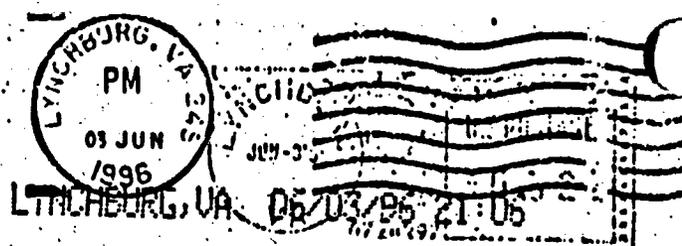
Gary W. Smith
Manager, Business Development



B&W Nuc
a McDermott company

Environmental Services, Inc.

2220 Langhorne Road
P.O. Box 10548
Lynchburg VA 24506-0548



Ms. Michelle Miskinis
Contracting Officer
US Department of Energy
1000 Independence Ave., SW
Attn: HR-561-21
Washington, DC 20585

Westinghouse
Electric Corporation

Energy Systems

15
Nuclear Services Division

Box 355
Pittsburgh Pennsylvania 15230-0355

MPC-M1-ESBU-96-058

June 6, 1996

Ms. Michelle Miskinis
Contracting Officer
U. S. Dept. of Energy
1000 Independence Avenue, SW
Attention: HR-561.21
Washington, D.C. 20585

Dear Ms. Miskinis:

Please put the Westinghouse Energy Systems Business Unit (ESBU) on the distribution list to receive additional information on the DOE Notice of Waste Acceptance, Storage and Transportation Services [Federal Register: May 28, 1996 (Vol. 61, Number 103)].

Sincerely,

John Iacovino
John Iacovino
ESBU MPC Program Manager

/jas

COMMERCIAL VEHICLE SAFETY ALLIANCE



An Association of State, Provincial and Federal Officials
Responsible for the Administration and Enforcement of Motor
Carrier Safety Laws in the United States, Canada and Mexico.

16

5430 GROSVENOR LANE • SUITE 130 • BETHESDA, MD 20814 • TEL: (301) 564-1623 • FAX: (301) 564-0588

June 6, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. Dept. of Energy
Attention: HR-561.21
1000 Independence Ave. SW
Washington, D.C. 20585

Dear Ms. Miskinis:

This correspondence is the Commercial Vehicle Safety Alliance's (CVSA) response to a request for expression of interest and comments regarding the "Notice of Waste Acceptance, Storage and Transportation Services" in the Federal Register, Vol. 61, No. 103, dated Tuesday, May 28, 1996.

CVSA is a not for profit organization of Federal, State and Provincial Government agencies and representatives from private industry in the United States, Canada and Mexico dedicated to improvement of commercial vehicle safety. The mission of the Alliance is to achieve uniformity and reciprocity of commercial vehicle inspections and enforcement activities throughout North America through effective motor carrier, driver, vehicle and cargo safety standards, compliance, education, and enforcement.

In 1986, the Commercial Vehicle Safety Alliance (CVSA), was recognized by the Office of Civilian Radioactive Waste Management (OCRWM) as the organization of State officials responsible for the administration and enforcement of motor carrier safety laws. To ensure safety and minimize the need for duplicate inspections, OCRWM requested that CVSA work with them and provided a Cooperative Agreement to develop uniform inspection procedures/out of service criteria and a model agreement for inspection reciprocity of shipments under the Nuclear Waste Policy Act of 1982. This enhanced procedures/out of service criteria and training curriculum was developed, select inspectors trained, and a pilot program initiated to test the procedures. CVSA is now in a position to recommend the procedures and out of service criteria for the transportation of spent nuclear fuel. CVSA has demonstrated through this Cooperative Agreement and others that it has the ability "to get the job done" in an efficient and cost effective manner.

Ms. Miskinis

CVSA comments on Federal Register Vol. 61, No.103

Page 2

CVSA is of the opinion that OCRWM needs to develop a Transportation Plan for spent nuclear fuel, which has as its cornerstone the CVSA developed program known as the "Enhanced North American Standard Inspection Procedures for Commercial Vehicles Transporting Transuranics, Spent Fuel and High-Level Radioactive Waste". The procedures as developed are a practical and workable method of inspecting radioactive shipments, and hold them to a higher standard which will insure a safer and more reliable transportation system.

CVSA is prepared to contract with OCRWM, to provide training for state and tribal inspection and enforcement personnel involved in the inspection of motor carrier transporters. CVSA will also agree to coordinate and provide national leadership and supervision of the inspection effort to insure uniformity, compatibility, reciprocity and efficiency of inspections, throughout the country.

With the use of the Enhanced Procedures the following will be accomplished:

- Provide and insure a transportation system that stresses safety as the most important facet involved in the movement of spent nuclear fuel.
- The carrier/s including their drivers will realize and appreciate that it is critical that their vehicles and drivers be of the highest caliber in order to successfully adhere to the Enhanced Procedures.
- Provide a strong sense of security and safety for the enforcement community and the general public in the transportation of spent nuclear fuel.
- A cost effective, successful, viable and tested inspection mechanism in place within all the states, which is accepted and strongly supported by the enforcement community. A similar proposal is in place to accommodate the Native American tribes, and movement of spent nuclear fuel through their reservations.
- An inspection program which is consistent, and uniform throughout the United States, and that the inspection equipment, procedures and personnel are trained and CVSA certified. This will help to eliminate delays in shipments, excessive burden to the industry and concern and frustration by the general public.
- An inspection procedure which is maintained and kept current, with a viable and efficient monitoring and distribution system.
- Access, cooperation and assistance from an international organization whose members presently conduct safety inspections and enforce safety regulations covering on-highway transportation of goods including hazardous materials.

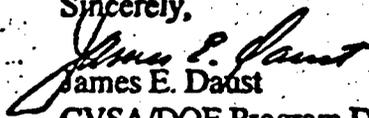
Ms. Miskinis

CVSA comments on Federal register Notice Vol. 61, No.103.

Page 3

CVSA would be very happy to provide a formalized proposal with budget to accomplish what has been outlined above. Please do not hesitate to contact me if you have any questions regarding our sincere interest and comments regarding this aspect of the transportation of spent nuclear fuel. My telephone number is (517) 732 4727, Fax is (517) 731 2954.

Sincerely,



James E. Daust

CVSA/DOE Program Director

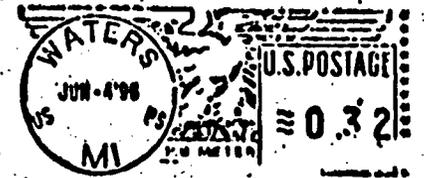
7346 Lombard Ave.

Gaylord, Michigan 49735

COMMERCIAL VEHICLE

6430 GROSVENOR LANE • SUITE 1500 ... SDA, MD 20814

James E. Dault
C.V.S.A.
7346 Lombard St.
Gaylord, MI 49735



Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
Attention HR-561.21
1000 Independence Ave. SW
Washington, D.C. 20585



STONE & WEBSTER ENGINEERING CORPORATION

245 SUMMER STREET, BOSTON, MASSACHUSETTS 02210



TELEPHONE: 617-553-8111

FAX: 617-553-2156, 8071

BOSTON, MA
CHATTANOOGA, TN
CHERRY HILL, NJ
CHICAGO, IL
DALLAS, TX
DECATUR, AL
DENVER, CO
FT. LAUDERDALE, FL
HOUSTON, TX

NEW YORK, NY
OAK RIDGE, TN
PORTLAND, ME
PORTLAND, OR
RICHMOND, VA
RICHMOND, VA
PLEASANTON, CA
TAMPA, FL
WASHINGTON, D.C.

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Avenue, SW
Attention: HR-561.21
Washington, DC 20585

June 4, 1996

Dear Ms. Miskinis:

**SPECIAL NOTICE REQUEST FOR EXPRESSION OF INTEREST AND COMMENTS
REGARDING OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
TRANSPORTATION PLAN POC**

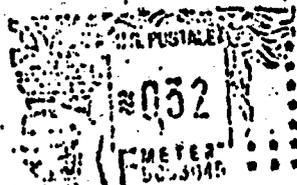
Please issue one copy of the aforementioned document which was announced in the Commerce Business Daily of May 24, 1996.

Thank you for your assistance.

Very truly yours,

C. F. Grochmal
Vice President

200 SUMNER STREET, BOSTON, MA 02210



Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Avenue, SW
Attention: HR-561.21
Washington, DC 20585



GA FORM REV 1991

TELECOPY FORM

18

 GENERAL ATOMICS P.O. BOX 85608 SAN DIEGO, CA 92186-9784 3550 GENERAL ATOMICS CT. SAN DIEGO, CA 92121-1194	TO: Ms. Michelle Miskinis DOE-HQ Contracts Washington DC	FROM: R. M. Grenier, Director Nuclear Waste Management Div 15-219A
		3 TOTAL PAGES (incl cover)
	PHONE NO: 202-634-4413	PHONE NO: 619-455-2563
	FAX NO: -4419	OMNIFAX-85 NO: -2596
	VERIFY NO: -4420 (Secy)	VERIFY NO: (Secy) -2595

June 18, 1996

We are faxing this to meet submittal date. Hard copy of original and 3 copies are being sent separately.



GENERAL ATOMICS

NWM:RMG:204:96

File 6.8.118

June 18, 1996

NJ. 057

412

Ms. Michelle Miskinis
Contracting Officer
Attention: HR-561.21
US DEPARTMENT OF ENERGY
1000 Independence Avenue SW
Washington, DC 20585

Subject: Notice of Waste Acceptance, Storage, and Transportation Services; Request for Expression of Interest and Comments

Dear Ms. Miskinis:

As you are aware, General Atomics (GA) is very much interested in the subject service opportunity as evidenced by its continuing the development of the GA-4 and GA-9 spent fuel transportation casks as a private venture. GA began the development of these casks over ten years ago in response to OCRWM's From-Reactor Cask Development Program, and believes these casks will have a role to play in the safe and efficient transportation of the nation's commercial reactor spent fuel.

In the following paragraphs, GA provides its comments as you requested in the subject notice.

Uncanistered Fuel

First, GA believes that the DOE should vigorously pursue the development of bare fuel handling facilities in the early phases of any interim storage site. Transportation of uncanistered spent fuel is more efficient, more economical, and has less environmental impact than transporting canistered fuel. Developing canistering facilities at 70 reactor sites, most of which are operating nuclear power plants, and manufacturing transportation canisters that are significantly more expensive than storage-only canisters, is inherently less economical than using casks with reusable baskets for transportation and separate casks or modules for storage. A cost savings of \$200,000 per canister or \$1,800/MTU can be saved in the capital cost of canisters alone. Furthermore, several reactor sites do not have the facilities that are compatible with the handling of the large rail casks used with canistered fuel; e.g., crane capacity is insufficient, rail access is lacking, etc. Many of the sites are at some of the oldest reactors whose spent fuel has highest acceptance priority. Fuel from these plants will be handled bare and be among the first to be accepted.

Industrial Capability

The capability of the industry is sufficient to meet any reasonable near-term capacity requirements. The real question is whether there is a near-term requirement. Once orders are placed, casks will be developed and constructed to meet the needs of any

DOE - M. Miskinis

2

June 18, 1996

order. What the industry won't do is construct hardware before there is a prudent expectation that it will recover its investment with a reasonable profit. One way to solve this will be for the DOE to sign contracts with the industry that can be used as collateral to finance the construction of a fleet of casks.

Plant Modifications

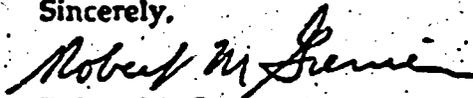
The standard contract with the Purchasers gives the DOE the opportunity to approve all delivery schedules which can be delegated to the service contractors. Each contractor would have every incentive to optimize its deliveries to make best use of its equipment and staff, as do the Purchasers who will want to minimize any impact on plant operations, yet still dispose of the spent fuel in a timely manner. Thus, each party has an incentive to minimize its own costs and is in the best position to negotiate a delivery schedule that meets its own needs and minimizes overall system costs. It would not seem reasonable for Purchasers to make plant modifications, etc., to reduce shipping costs, as DOE has the responsibility for all shipping costs. On the other hand, Purchasers will make plant modifications, etc., as necessary to reduce their costs of loading the spent fuel if it reduces their overall costs. Purchasers have an obligation to their customers and stockholders to minimize their own costs, not the overall system costs. The only motivation a Purchaser would have to increase its costs in order to reduce the overall system costs would be for the Purchaser to receive a reduction in fees that compensates for its increased costs.

Regional Contractors

One aspect of having four regions, with four service contractors, is that the contractors may develop conflicting schedules for the arrival time of shipments to the storage site. Additionally, the origins of shipments may not be distributed very evenly between the four regions, as most of the oldest plants with the most of the oldest fuel may be in one region. Finally, a Purchaser in one region may trade its allocation with a Purchaser in another region, which would change the level of planned work for both of the affected service contractors. Some consideration of these circumstances is recommended. Nonetheless, GA believes a regional approach is as good as any other approach in assuring that there are several competitors in the business.

Please send any further information concerning this opportunity to my attention. If you have any questions regarding this letter, please contact me at 619-455-2583 (FAX 619-455-2596).

Sincerely,



Robert M. Grenier

Director

Nuclear Waste Management Division



Los Alamos Technical Associates, Inc.

2400 Louisiana Blvd., NE, Building 1, Suite 400 / Albuquerque, NM 87110 / Telephone (505) 884-3900 / FAX (505) 880-3560

19

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Attn: HR-561.21

Reference: CBD Announcement May 24, 1996 Request for Expression of Interest and Comments
Regarding Office of Civilian Radioactive Waste Management Transportation Plan

Dear Ms. Miskinis:

Los Alamos Technical Associates (LATA) is interested in pursuing the above referenced Transportation Plan and wish to receive all future correspondence and notices. LATA has supported the DOE's OCRWM Program since its inception and wishes to continue to do so. Through both Los Alamos National Laboratory and the Sandia National Laboratories we have supported the efforts at Yucca Mountain and the National TRU Program. One of our goals is to support the DOE to put into place a fully functioning waste management system for the country.

I apologize for this last minute submittal, but through an oversight it has only today been brought to my attention. Thank you for your consideration and support in being placed on your distribution list for future information.

Sincerely:

Leo W. Scully
Manager of Nuclear Waste Programs

E. J. Bentz & Associates, Inc.

7915 RICHFIELD ROAD
SPRINGFIELD, VIRGINIA 22153
(703) 455-7400

8090B FRANCONIA ROAD
ALEXANDRIA, VIRGINIA 22310
(703) 922-2105

June 4, 1996

Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Avenue, S.W.
Attn: HR-561.21
Washington, D.C. 20585

RE: Commerce Business Daily (Issue No. PSA-1602, May 24, 1996): "Request for Expression of Interest and Comments Regarding Office of Civilian Radioactive Waste Management Transportation Plan"

Dear Ms. Miskinis,

Please regard this letter as a submission of expression of interest regarding the above cited announcement. At this time, we do not have any comments.

Please place our firm on the list to receive future announcements and additional information which may include draft solicitation documents in preparation for a potential presolicitation conference.

Please address all correspondence to:

Carole B. Bentz
Vice President
E.J. Bentz & Associates, Inc.
7915 Richfield Road
Springfield, Virginia 22153

Thank you for your consideration.

Sincerely,

Carole Bentz
Carole B. Bentz
Vice President

**ARGONNE NATIONAL LABORATORY
ENVIRONMENTAL ASSESSMENT DIVISION
9700 South Cass Avenue, Building 900
Argonne, Illinois 60439-4812**

O. Benjamin Schoepfle
Ph: 708.252.1908
Fx: 708.252.3659
schoepfle_b@anl.gov

21

**Ms Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Avenue SW
Attention: HR-561.21
Washington D.C. 20585**

June 7, 1996

Dear Ms Miskinis,

This letter is in response to the *Federal Register* announcement of May, 28, 1996 (Volume 61, Number 103), where The Office of Civilian Radioactive Waste Management (OCRWM), Department of Energy, entered a notice of "Waste Acceptance, Storage, and Transportation Services" and called for "expression on interest and comments".

Please put the following names on any lists of announcements or communications with regard to this action, including any planned conference activities:

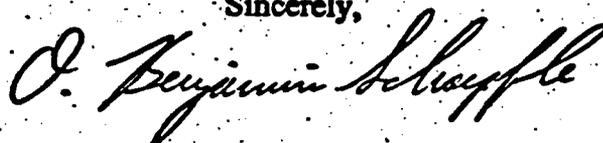
**Dr. Benjamin Schoepfle
Environmental Assessment Division
Argonne National Laboratory
9700 South Cass Avenue, Building 900
Argonne, Illinois 60439-4812**

**Dr. John R. Krummel
Environmental Assessment Division
Argonne National Laboratory
9700 South Cass Avenue, Building 900
Argonne, Illinois 60439-4812**

Scientists of the Environmental Assessment Division (EAD) acted as the technical lead in the development of the environmental impact statement for the Multi-Purpose Canister. In the course of this work, important perspectives and understandings of the spent fuel disposal system were developed, especially with regard to the spatial mathematical modeling of the system's logistics, covering the movements, handling, and long and short-term storage of spent fuel.

We believe that unique EAD capabilities can be of significant use in the further development of methodologies and modeling software which might be used to support OCRWM decision making. This is especially true in the spatial modeling of facility and activity location, logistics, and scheduling. EAD has the capacity to develop mathematical models with far higher spatial and temporal resolution than any prior approaches. These modeling frameworks can allow decision makers and planners powerful insight as to the nature and complexities of disposal system activities, with a better sense of the precise locations and timing of events. This can be particularly important in: analyzing the behavior of any markets in priority rankings (where pick-up times are exchanged between utilities); and assessing the feasibility and quality of alternative logistics and operations systems proposed by various corporate bidders.

Sincerely,





1655 North Fort Myer Drive, Suite 700, Arlington VA 22209

Governmental Dynamics
INCORPORATED

703.818-2434 Fax: 703.818-2437

June 4, 1996

Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave., SW
Attention: HR-561.21
Washington, DC 20585
Re: *Federal Register* Notice published Tuesday, May 28, 1996

Dear Ms. Miskinis:

I would like to be placed on your list to receive additional information, including any draft solicitation documents and information on the preparation of the presolicitation conference.

My firm, Governmental Dynamics, Inc. represents Nye County, Nevada. We plan on submitting comments in response to the Office of Civilian Radioactive Waste Management's (OCRWM) request for expression of interest and comments published in the *Federal Register* on Tuesday, May 28, 1996. It is our understanding that comments will be received by OCRWM up until July 19, 1996.

Thank you for adding me to your respondents list.

Sincerely,

Cheryl A. Faubert
Associate

ADVENT
ENGINEERING SERVICES, INC.

23

June 17, 1996
AM96-14

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy

SUBJECT: *Request for Information re. Presolicitation Conference for Acquisition of
Transportation Services*

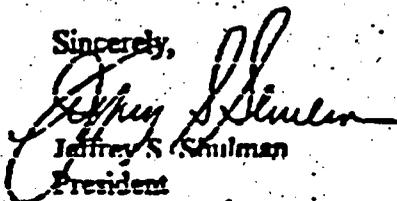
Dear Ms. Miskinis:

I understand that information contained in the May 1996 CBD and FR announcements can be obtained from you for those without access to the World Wide Web. I understand that the draft *Statement of Work and draft Waste Acceptance, Transportation and Storage Concept of Operations* would be available in hardcopy by June 18, 1996. I would certainly appreciate it if these documents could be forwarded to:

ADVENT Engineering Services, Inc.
17 Crow Canyon Court, Suite 100
San Ramon, CA 94583

Thank you for your assistance in this matter.

Sincerely,



Jeffrey S. Shulman
President

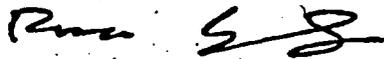
24

June 4, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave SW
ATTN HR-561.21
Washington, DC 20585

As discussed with you on the phone today, EPRI is interested in receiving any available information regarding Office of Civilian Radioactive Waste Management Transportation Plan POC; please send to me directly. We have an ongoing interest in this subject and I thank you for your assistance.

Sincerely,



Manager
Fuel Reliability, Storage and Transportation

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With regard to low cost of service... If this is an objective, then OCRWM should consider letting the purchaser obtain whichever services are required, with OCRWM ultimately paying the bill. The reason is, experience shows that DOE seldom receives the same level of "service" as the commercial sector for a given cost. One reason for this may be administrative costs that are sometimes attributed to work for "the government."

4. There would seem to be no doubt that sufficient production capacity exists to meet any projected need given even short notice.

5. The central issue to innovation is: When will the market exist? Contractors can not create the market in this case. There has to be some place to go before there is a need to get there. To obtain the ultimate in innovation, DOE could open a spent fuel storage facility someplace, and then announce to the utilities that if they can get the fuel there in a sealed canister (at least initially), then DOE would "accept" it. Shipment of assemblies would wait until DOE had a canisterizing facility on site. Such a facility is probably ultimately needed, since disposal will likely require a canister as yet not defined. Even if DOE opened a site, there still need to be an orderly arrival of spent fuel.

6. No specific comments on this issue, other those embedded in comments for issues 1 through 5.

I look forward to receiving further information from the OCRWM program as it becomes available.

My address is:

Larry Danese
1317 Hearst Drive, NE
Atlanta, GA 30319

Telephone: 404-266-8343 (Voice and Fax)

Sincerely,


Larry Danese

June 10, 1996

Ms. Michelle Miskinis
Contracting Officer
Attn: HR-561.21
U. S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Ms. Miskinis:

RE: Federal Register Notice, Tuesday, May 28, 1996. Request for Expression of Interest and Comments.

Please accept my expression of interest in providing future support to the Office of Civilian Radioactive Waste Management. I have worked on OCRWM programs in support of the future spent fuel shipments for many years, and hope to provide support in the future.

We appreciate the opportunity afforded to comment on the proposed structure of the program, even though it is understandably sketchy at this time. With regard to the issues presented:

1. While choice of method for service seems a reasonable talking point, it is not clear how the schedule agreement reached by a contractor and purchaser would relate to a receipt schedule that would be needed to operate the storage/ disposal site efficiently. Further, the statement of the issue implies the abandonment of the "Oldest Fuel First" policy. It strikes me that this remains an equitable way by which the line that utilities must stand in to establish order of service at the receiving site is established.
2. To date, utilities have shown a willingness to upgrade plant capability to handle large storage casks. It seems reasonable to expect that similar upgrades will be made to support shipping of large casks in order to reduce cask handling and the total number of shipments, resulting in less rem burden for the plant crew.
3. It is not clear why division of service area into regions as proposed would lead to "low cost services to OCRWM" and it is not clear what "industrial capability" is being preserved. The dry storage market has shown that domination is improbable, and from time to time an "unknown" is awarded a storage contract. That aside, it would be difficult to argue that "trucking" or "rail" capability is preserved by the award of even a contract for all of the service requirement. The entire contract would be only a small percentage of the truck and rail market. Consequently, any sharing of the revenue would be because we want to do it that way. Once sharing is determined, the split used is probably arbitrary. The basic difficulty is that both quantity of fuel and timing of shipments should be considered, and these would seem to have no specific relationship to the NRC regions.

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Joe P. Colvin
President
1996-1997

June 20, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave., SW
Attention HR-561.21
Washington, D.C. 20585

Subject: Request for Expression of Interest and Comments on DOE's
Notice of Waste Acceptance, Storage, and Transportation
Services [61 *Federal Register* 26508 (May 28, 1996)].

Dear Ms. Miskinis:

The Nuclear Energy Institute (NEI)¹ is pleased to submit comments to the Department of Energy on the notice of waste acceptance, storage and transportation services in the May 28, 1996, *Federal Register*. The general concepts presented in the *Federal Register* notice are appropriate, reflect a great deal of advance planning and strategic thinking and, most important, are a welcome step forward for the civilian radioactive waste management program.

The nuclear energy industry believes that a market-based approach to acceptance, storage and transportation of utility spent nuclear fuel is essential. Since U.S. nuclear utilities are DOE's customers for these services, and since DOE's program and utility plans are closely interrelated, we believe the nuclear energy industry should be directly involved in the development of any program for spent fuel acceptance, storage and transportation.

The U.S. nuclear energy industry has already launched several initiatives to provide unified guidance for planning and implementing a waste acceptance, storage, and transportation program. Based on these initiatives, we will provide more detailed comments on this program in the coming months.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear materials licensees, and other organizations and individuals involved in the nuclear energy industry.

In advance of our more detailed comments, however, we would like to address several points at this time:

Cost Recovery: DOE and the industry must work together to determine how the federal government will reimburse utilities for the cost of spent fuel containers purchased and used by nuclear utilities that will also be used at the DOE site. DOE should also pay for certain other utility expenditures in the future. The criteria, mechanism, and timing of reimbursements should be fully explored by DOE, state utility regulators and the industry in the process of developing the spent fuel acceptance, storage and transportation program.

Cooperation: The program for spent fuel acceptance, storage and transportation should provide appropriate opportunity for feedback from the industry, and clearly defined mechanisms to resolve differences between the industry and DOE. The nuclear utilities will take all reasonable steps to minimize costs. DOE can support this goal by structuring the procurement so that market forces encourage cooperation among utilities and all other participants.

Contract Type: The Energy Department can encourage cost effective delivery of waste acceptance, storage and transportation services by fostering competition. Competitive, fixed-price contracts would both create competition and ensure contractor accountability. Reliance on market forces would promote a more cost-effective and timely program. The request for proposals and resulting contracts should be administered by DOE in a flexible and efficient manner. The industry would like to work with DOE in designing and implementing the optimum contracting approach.

The nuclear industry is committed to working with DOE to coordinate a successful waste acceptance, storage and transportation program to begin moving spent fuel by the end of this decade. Such a program is an integral part of a successful integrated spent fuel management system.

That integrated system must also include construction of a centralized interim storage facility by the end of the decade. Those two elements—a market-based program for waste acceptance, storage and transportation and construction of an interim storage facility—will enable DOE to meet its responsibility to begin accepting spent nuclear fuel by January 31, 1998, from nuclear power plants across the country—as required by the 1982 Nuclear Waste Policy Act.²

² See NEI comments filed on September 21, 1994 in response to DOE's Notice of Inquiry on Waste Acceptance Issues (59 Fed. Reg. 27007 - May 25, 1994).

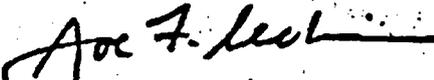
Ms. Michelle Miskinis

June 20, 1996

Page 3

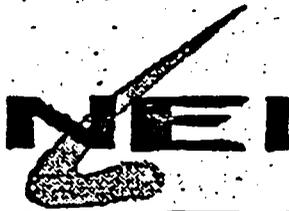
This procurement will help create a significant component of an integrated spent fuel management system, which will save nuclear electricity customers billions of dollars. More importantly, it will help demonstrate the nation's commitment to managing spent nuclear fuel instead of leaving that responsibility to future generations.

Sincerely,



Joe F. Colvin

c: The Honorable Daniel A. Dreyfus



NUCLEAR ENERGY INSTITUTE

FAX Cover Sheet

To: Dwight Shelor
Dave Zabransky

Company: DOE
Fax: (202) 586-1047

From: Joe Colvin
Phone: 202-739-8075

Date & Time: Friday, June 21, 1996
Pages including —
cover sheet: 4

June 20, 1996

Ms. Michelle Miskinis, Contracting Officer
U.S. Dept. of Energy
1000 Independence Ave. SW, Attn: HR-561.21
Washington, DC 20585

Subject: OCRWM Transportation Plan, CBD Issue, May 24, 1996, PSA #1602

Dear Ms. Miskinis:

Packaging Technology, Inc. (PacTec) is pleased to submit an Expression of Interest for participating in your planned acquisition for transportation of spent nuclear fuel and other associated activities. As you can see from the attached Capabilities Summary, PacTec is well qualified to design and license packages, transport equipment and associated hardware for the movement and storage of spent nuclear fuel. Our capabilities and experience as a hardware provider, teamed with a company equally qualified to provide the necessary services for preparing, loading, transporting and storage of spent nuclear fuel, make us well qualified to participate in this exciting project. Please include us on any future procurement activities.

Particularly indicative of PacTec's recognized capabilities throughout the radioactive materials packaging and transportation industry is our current role on development of the Multi-Purpose Canister (MPC) System for storage, transport and ultimate disposal of utility owned spent nuclear fuel. PacTec has the lead role for the design and SAR development phase of that DOE sponsored program. Our design responsibilities on the MPC program specifically includes having the lead role for all system integration activities as well as development of the spent fuel canisters, transportation casks and much of the auxiliary hardware.

In response to the issues raised in your 5/24/96 CBD notice, we offer the following comments:

- I. The EOI notes that contractors will be required to interface with State, Local and Tribal governments.

To what extent will these contractors act and serve as agents of the Federal Government? Will they be empowered to reach binding agreements with State, Local and Tribal governments? Clearly there are fundamental functions which the Federal Government cannot delegate to contractors. Will the contractor's role be limited to providing an information acquisition, distribution and transfer function?

- II. Contract Duration. Contract duration of 5-10 years are noted, with the first 2-3 years devoted to the procurement of necessary equipment. It is noted that this process will span several decades.

For the initial awards, a 2-3 year mobilization period is too short by approximately 12-18 months. The reason for this is that no US supplier presently possesses *all* the system elements and equipment needed to perform these comprehensive storage and transportation functions. Thus the mobilization period must be long enough to design, develop, certify and fabricate the needed systems and equipment. Using the MPC program as a guide: 12 to 18 months is needed to design, 12-18 months is needed to license, 8-12 months is needed to construct, and 4 months is needed to bring equipment and personnel into a state of operational readiness.

For subsequent awards, the 2-3 year period for mobilization is adequate because the equipment would exist and be available from others on lease, purchase or GFE bases.

Finally, the 5-10 year duration, needs to be fixed at the longest possible duration in order to enable equipment development costs to be amortized over the longest possible period. This amortization period will have a driving influence upon DOE costs, thus need to be minimized by using the longest possible amortization periods.

- III. *Dividing the Country by Region.* We believe other division concepts will enable contractors to provide higher quality services at lower costs to DOE. Specifically, we recommend a division and allocation of the market *by fuel and reactor types*. *First*, this fuel type allocation would minimize the equipment development and acquisition costs of the contractors. These savings would be passed along to DOE in the form of reduced fuel shipping costs and quicker mobilization. We recommend two PWR contracts, two BWR contracts, and a site-specific fuels contract to accommodate the unique fuels from small, older reactors. *Second*, this fuel type allocation would avoid the possible circumstance in which each regional contractor would launch comprehensive parallel design, development and licensing efforts. Such a four-fold redundancy would not only be extremely wasteful but more importantly would severely over-tax the qualified technical resources in this country -- as regards both design development and regulatory personnel.
- IV. *Resources to Perform.* Without question, the industry possesses sufficient resources to manufacture needed equipment. Presently the constraints related to the paucity of licensed equipment designs required to fulfill DOE's technical requirements are the "critical path" item. It must be understood that today *no* current supplier possesses the full range of capabilities (and designs) needed to perform comprehensive fuel transportation services as envisioned here in this OCRWM Transportation Plan. Supplier claims to the contrary are pure sales hype. This constraint is one of the key reasons why we recommend an allocation of contracts by fuel type rather than by region.
- V. *Potential Business Arrangements.* An essential requirement of a successful business arrangement will be the minimization of contractor uncertainty. Such minimization of uncertainty is absolutely essential to both DOE cost minimization

and achieving the goal of maximum competition. A few ways to minimize implicit uncertainties would be as follows:

- A. Treat the successful achievement of equipment mobilization as one or more fixed-price pay quantities. This would allow contractors to recover their sunk costs of equipment design, development and licensing.
- B. Set operational compensation at two pay quantities: (a) \$/kgU transported, and (b) \$/yr. lump sum retainer for providing standby transportation capabilities – used or not.
- C. At the conclusion of each service contract, DOE should plan to acquire the depreciated equipment assets (if offered by the contractor) and make such equipment available as GFE to any successor contractor.

We appreciate this opportunity to provide you with our comments and information about our company and look forward to participating in the upcoming presolicitation conference on July 9th, 1996 in Washington D.C.

Sincerely yours,
Packaging Technology, Inc.

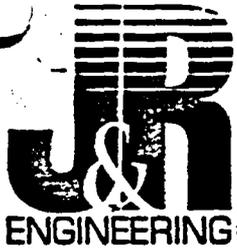


John D. Simchuk
Business Development Director

Attachment: PacTec Capabilities Summary

cc: R.T. Haelsig

PacTec



SPECIALIZED LIFTING AND TRANSPORTATION EQUIPMENT

(28)
J&R ENGINEERING CO., INC.
538 OAKLAND AVENUE
P.O. BOX 447
MUKWONAGO, WI 53149
414/363-9660
FAX/363-9620

June 17, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. DEPARTMENT OF ENERGY
1000 Independence Avenue, S.W.
ATTN: HR-561.21
Washington, D.C. 20585

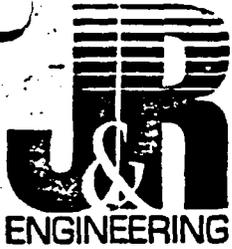
Dear Ms. Miskinis,

We read with interest the article in Radioactive Waste Exchange regarding the DOE's request for submissions of interest seeking information on development of spent nuclear fuel transportation services. After you've had a chance to review the enclosed, I will call you. Thank you.

Sincerely,

Richard M. Savignac / RS

Richard M. Savignac
V.P.- Marketing



J&R ENGINEERING CO., INC.
538 OAKLAND AVENUE
P.O. BOX 447
MUKWONAGO, WI 53149
414/363-9660
FAX/363-9620

SPECIALIZED LIFTING AND TRANSPORTATION EQUIPMENT

June 17, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. DEPARTMENT OF ENERGY
1000 Independence Avenue, S.W.
ATTN: HR-561.21
Washington, D.C. 20585

Dear Ms. Miskinis,

We read with interest the article in Radioactive Waste Exchange regarding the DOE's request for submissions of interest seeking information on development of spent nuclear fuel transportation services. After you've had a chance to review the enclosed, I will call you. Thank you.

Sincerely,

Richard M. Savignac /07

Richard M. Savignac
V.P.- Marketing

WASHINGTON NUCLEAR CORPORATION
3132 W. Joliet Court 127N
Mequon, WI 53092

June 13, 1996

Ms. Michelle Miskinis
Contracting Officer
U. S. Department of Energy
1000 Independence Ave. SW
Attention: HR-561.21
Washington, DC 20585

Dear Ms. Miskinis;

Given the severe time constraints under which Washington Nuclear Corporation is working at this time, it is not possible for us to provide extensive comments by the established in the May 28, 1996 Federal Register. We would, however, like to express our interest in participating in DOE's market driven approach for meeting the waste management responsibilities of the Office of Civilian Radioactive Waste Management (OCRWM).

The following brief comments are offered in order to provide you with a list of issues that we consider to be critical to the success of the program:

1. Before any of the market driven activities can commence, it will be necessary to revise the contractual basis for delivering spent fuel into the Federal waste management system. Utilities will need to be convinced to give up their delivery "entitlements" under the prevailing oldest fuel first prioritization system in order to promote the overall efficiency of the program. Given the pressure place on utilities to remove spent fuel from their sites at the earliest possible date, often without regard to the resulting costs, and the growing competition in the industry, it is not clear how this fundamental change can be accomplished.
2. Use of Nuclear Waste Fund contributions in a way that is equitable to all utilities has always been a critical issue, with the responsibility for making and paying for site modifications a primary point of contention. Unless the costs assumed by utilities can be shown to be in their own best interest (e.g., earlier and more rapid removal of spent fuel), opposition will be hard to overcome.
3. While the concept of awarding contracts by region to promote competition is reasonable in some respects, it may not optimize system performance. OCRWM must find some way to recognize the differences between the various transport modes and the often unique handling requirements at each of the nuclear power plant sites. Allocation by region would probably be the easiest to accomplish, but an allocation that allows contractors to specialize in dealing with specific sets of requirements (e.g., transport mode, cask type, fuel configuration, etc.) would be more likely to promote overall system efficiency.
4. Assigning full responsibility for transport arrangements to private industry could well prove to be a "two edged sword." While the contractors would be more likely to relay on regulations

than on consensus to accomplish their transportation objectives, there are likely to be frequent instances of intense opposition and even obstruction. In such instances, it may prove necessary for the Federal government to join private industry in opposing all illegal actions that interfere with accomplishment of the program's objectives.

There are numerous other issues that we feel are critical to the success of the OCRWM program, and would be happy to discuss them with you at a mutually convenient time. Washington Nuclear Corporation has had a longstanding interest in the success of the OCRWM program and would like to play a significant role in promoting its ultimate success.

If you would like to contact me for any reason, I can be reached by telephone at (414) 238-4631, fax at (414) 238-4632, and e-mail at hs@nynco.com. We look forward to receiving additional information on your plans and to participating in any presolicitation conferences.

Very truly yours,



Howard S. Shimon
Program Manager, Nuclear Fuel Cycle

BOE MILLER
Governor

STATE OF NEVADA

ROBERT W. LOUX
Executive Director

30

**AGENCY FOR NUCLEAR PROJECTS
NUCLEAR WASTE PROJECT OFFICE**

Capitol Complex
Carson City, Nevada 89710
Telephone: (702) 687-3744
Fax: (702) 687-5277

June 18, 1996

Ms. Michelle Miskinis, Contracting Officer
U.S. Department of Energy
1000 Independence Avenue, S.W.
Attention: HR-561.21
Washington, DC 20585

**RE: State of Nevada Comments on the Department of Energy's Federal Register Notice
of Waste Acceptance, Storage, and Transportation Services**

Dear Ms. Miskinis:

In response to the Notice of Waste Acceptance, Storage, and Transportation Services that appeared in the Federal Register, the State of Nevada offers the following comments.

- (1) The Notice suggests that contractors, not the Department of Energy, would be responsible for recommending preferred transportation modes and routes and for interfacing with states, tribes, and local governments along those routes.

Comment: As Nevada and other western, Midwestern, southern, and eastern states have historically insisted, the delegation of responsibility for making mode and route choices to carriers is unacceptable. This is clearly a DOE responsibility and one that DOE must accept if there is to be any effective planning and coordination of Nuclear Waste Policy Act (NWPA) shipments of spent nuclear fuel (SNF). Leaving the mode and route decisions to carriers invites confusion, conflict, and increased public distrust in the entire program. It would make it extremely difficult for States, tribes, and communities along potential transportation routes to plan for emergency response and readiness since DOE is

proposing as many as four different contractors to be responsible for different geological regions of the country. That means that states and tribes would have to work with multiple contractors on the route identification process. Such a process would be unwieldy and likely not result in the establishment of route preferences in time to implement adequate emergency response and preparedness capabilities.

Until publication of this Federal Register Notice, DOE had made commitments to the states that it would engage in a route selection process and take responsibility for shipment modes and route decisions. This Notice is a major step backward and threatens to undermine the good work that DOE staff has done over the past two years in establishing communication with potential corridor states and tribes. Viewed in combination with the devastating reductions in DOE assistance for cooperative agreement groups of states, such as the Western Interstate Energy Board and other regional groups, the Notice signals a disturbing retrenchment in DOE's willingness to work with states and tribes in resolving difficult issues like route and mode selection.

- (2) The Notice completely ignores the need to integrate waste acceptance, storage, and transportation with other key aspects of DOE's NWPA responsibilities.

Comment: The Notice appears to compartmentalize the transportation of SNF from the preparation that is required to assure safe and uneventful shipment of these materials in unprecedented numbers and for an unprecedented shipping campaign duration. There is no provision, for example, to coordinate activities contemplated under the Notice with the activities required under Section 180 (c) of the NWPA (emergency response training and preparedness). As noted above, the approach embodied in the Notice may make it difficult or impossible to provide Section 180 (c) assistance to affected states and in the time frames necessary for effective training and preparation.

The Notice also sets up a "system" of waste management that is uncoordinated and likely to involve multiple types of transportation and storage containers, further complicating operations throughout the system. Such a process rewards fragmentation and prohibits standardization of storage and transport components that could bring significant efficiency to the entire program. One of the attractive features of DOE's now defunct MPC initiative was that it contributed a certain stability to the transportation planning process by reducing some of the uncertainties about shipping container characteristics and performance. The system reflected in the current Notice eliminates any incentives for coordination

and standardization, and will likely result in costs being the deciding factor in the selection of transport and storage technologies.

- (3) The Notice indicates that DOE does not intend to respond to any of the comments it receives. This is inappropriate given the importance of the issues being addressed and the significant implications for major changes in DOE's approach to SNF transportation planning.

Comment: The Notice represents an major - and potentially damaging - departure from over 15 years of incremental progress DOE has made in working with states and tribes in planning for the safe transportation of spent nuclear fuel. The transportation of SNF and other high-level radioactive waste to a repository will affect hundreds of cities and thousands of communities in 43 states for a period that spans decades. For DOE to simply discard a centralized and participatory planning process for one that relies solely on arbitrary contractual decision-making is inappropriate and unacceptable. This type of major program policy change requires DOE to not only respond specifically to comments received, but also to engage in a process of assessing the proposed new direction in light of past planning and commitments with affected parties. This should be done through dialogue and interaction with affected states and regional groups, such as the Western Interstate Energy Board.

I hope these comments are helpful to you. Should you have questions or need additional information, please let me know.

Sincerely,



Robert R. Loux
Executive Director

BDC
SERVICES, INC.

31

11 June 1996

Ms. Michelle Miskinis, POC
The US Dept. of Energy
The Office of Civilian Radioactive Waste Mgt.
1000 Independence Ave. S.W. Att. HR 561.21
Washington, D.C. 20585

Radiological Waste Management

Dear Ms. Miskinis:

The enclosed SOQ will give you some idea of our capabilities as a transporter. you will note that we have considerable experience in and about nuclear reactors. We are obviously interested in what happens to all form of waste on Nuclear facilities. Hopefully, as these problems reveals themselves BDC Services will be a player in its solution. As such we would appreciate being plugged into the loop as information is disseminated to the hetherland. Kindly add our name to any type of list that is being generated to this end.

Sincerely,



Mike Duncan,
VP Business Development



June 11, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Avenue, SW
Attention: HR-561.21
Washington D.C. 20585

Re: Notice of Waste Acceptance, Storage and Transportation Services

Dear Ms. Miskinis:

In response to the notice published in the May 28, 1996 Federal Register (61 Fed. Reg. 26508), this letter will serve as Union Pacific Railroad Company's "Submission of Interest." Please advise the individuals listed below of the presolicitation conference (if one is held) and provide them with any additional materials that may be made available:

Lawrence E. Wzorek
Joseph D. Anthofer
Union Pacific Railroad Company
Law Department - Room 830
1416 Dodge Street
Omaha, NE 68179-0001
Phone (402) 271-3897
Fax (402) 271-5610

An additional three copies of this letter are enclosed as requested in the May 28 notice.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert T. Opal", written over a horizontal line.

Robert T. Opal
General Attorney
Direct dial: (402) 271-3072
Fax: (402) 271-5610

cc: Larry Wzorek - Room 830
Joe Anthofer - Room 830
Joe Bateman - Room 801

UNION PACIFIC RAILROAD COMPANY
FACSIMILE TRANSMISSION



Law Department
Room 830

1416 Dodge Street
Omaha, NE 68179

Deliver to: Michelle Miskinis

Co./Dept.:

Fax No.: 202-634-4419

Date: June 20, 1996

From: Larry Wzorek

Phone: (402) 271-3897

No. of Pages Transmitted _____ + Cover

COMMENTS:

Ms. Miskinis:

Please forward via overnight mail a copy of the draft Statement of Work and draft Waste Acceptance, Transportation and Storage Concept of Operations. Thank you.

LEW.

Transmitting From

Fax No. (402) 271-6610
(402) 271-5625

**IF YOU DO NOT RECEIVE ALL PAGES
CALL US AS SOON AS POSSIBLE
(402) 271-4758**

This facsimile message may be a privileged and confidential communication and is intended for the use of the person to whom it was sent. If you have received this message in error, please notify us immediately at (402) 271-4758. This message should not be disseminated or copied if you are not the intended recipient, but should be returned to the above address by mail or destroyed. THANK YOU.

** TOTAL PAGE.001 **

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NET TRANSPORT INC. WINDOW LOGISTICS INC.
NATIONAL CONTAINER NETWORK, INC. T&S SON
PRIMEER EXPORT, INC. TMO LOGISTICS INC.
PRIORITY FREIGHT SYSTEMS

TRANSMODAL CORPORATION

109 Morgan Rd. Oak Ridge, TN. 37830

TELECOPIER TRANSMISSION

DATE: JUNE 17, 1996 TIME: 9:06 AM FAX 202 634 4419

ATTENTION: MS. MICHELLE MISKINIS

U.S. DEPARTMENT OF ENERGY

TRANSPORTATION SERVICES CIVILIAN RADIOACTIVE WASTE MANAGEMENT DIVISION

FROM: TRANSMODAL CORPORATION,

109 MORGAN ROAD

OAK RIDGE, TN. 37830

OFFICE: 1-800 881 1278

FAX: (423) 482-0227

SENDER: STEVE SHIRE

RE: PRESOLICITATION CONFERENCE FOR ACQUISITION OF TRANSPORTATION SERVICES

MESSAGE:

This letter is to express TRANSMODAL CORPORATION and its teaming partners interest in competing and providing the necessary services required to prepare, package, load, and transport spent nuclear fuels and the associated activities to complete the assignments. We would like to attend the presolicitation conference on July 9th at the Forestall building. We plan to sent two representatives to the conference. please send us the information on the conference to the address above

Our proposal for service combines the teaming of SAIC, Norfolk Southern and Transmodal Corporations to offer a SEAMLESS APPROACH to logistics services, including site work, planning, packaging, scheduling, container delivery, container

FROM : TMC-OAK RIDGE

PHONE NO. : 4234820227

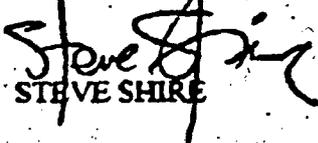
Jun. 19 1996 12:46PM P1

pickup, road transportation, rail transportation, and documentation storage support and maintenance.

This is a unique combination of services: rail, truck, containers, ocean logistics. Transmodal will provide on-site load planning supervision and dispatch personnel to maximize loading and minimize delays. Transmodal, working with SAIC to provide for 24-hour tracking for movements of containers and equipment. Transmodal can provide for full-time coordination at the overseas loading and the US delivery sites and rail head. In the transportation and packaging operations, Transmodal and SAIC maintains a competitive edge through professional development. Working with the DOE Environmental Management, Transportation Management Division's services group, Transmodal continuously monitors new regulatory trends, proposed dockets and interpretations of regulations by the US Department of Transportation (DOT), The Occupational Safety and Health Administration (OSHA), The U.S. Environmental Protection Agency (EPA), and the Department of Defense (DOD).

Thank you for giving us the opportunity to participate in the up coming proposals. In addition to providing the specific services indicated in our proposals, we pledge to conduct our services in a manner which assures your satisfaction.

RESPECTFULLY,


STEVE SHIRE

NELSON MANUFACTURING COMPANY

Builders of Nelson Trailers

6448 US Route 224 East
Ottawa, Ohio 45875-9789
Phone (419) 523-5321
Fax (419) 523-6247

June 12, 1996

Ms. Michelle Miskinis
Contracting Officer
U.S. Dept of Energy
1000 Independence Ave. SW
Washington D.C. 20585

Ref: HR-561.21

Dear Ms. Miskinis:

Nelson Mfg. Co for the past 48 years has established its reputation by designing and building trailers to meet the special transportation requirements of its customers.

Some of our more interesting projects have been trailers designed for the nuclear industry. The following is a list of some of those projects.

A cask trailer for Westinghouse Idaho Falls
(70 ton capacity for on site use)

A Buss cask trailer for Westinghouse Hanford
(20 ton capacity for over the road travel)

Equipment transporter for Westinghouse Hanford
(150 ton capacity for on site transporting)

Two trailers for SGN/Transnuclear
LR-56 Westinghouse Hanford/Martin Marietta

Trailers for compacting hospital waste
Mobile press for E W Bliss/Westinghouse Hittman

A trailer for hauling contaminated casings and pumps
Westinghouse Hanford (70' long with elevating platform)

NELSON MANUFACTURING COMPANY

Builders of Nelson Trailers

6448 US Route 224 East
Ottawa, Ohio 45875-9789
Phone (419) 523-5321
Fax (419) 523-6247

We are presently involved with the following projects.

One trailer for SGN/Transnuclear
LR-56 Westinghouse Hanford/Savannah River

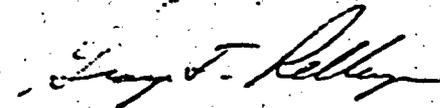
Two trailers for Mobilized Systems/Westinghouse Hanford
Transporting long length (70'-80') contaminated equipment.

Multiple trailers for Transnuclear/Westinghouse Hanford
Transporting spent nuclear fuel-K Basin.

This brief history will hopefully provide an insight into our capabilities. Enclosed you shall also find a brochure representing some of our other products.

Please include us on your list of parties interested in the transportation of Spent Fuel and High Level Radioactive Waste.

Yours truly,



George F. Rellinger



**SYSTEMATIC
MANAGEMENT
SERVICES, INC.**

20201 Century Boulevard
Germantown, MD 20874
(301) 353-0072
(301) 353-0076/FAX

35

June 13, 1996

Ms. Michelle Miskinis, Contracting Officer
U.S. Department of Energy
1000 Independence Avenue, SW
ATTN: HR-561.21
Washington, DC 20585

RE: Office of Civilian Radioactive Waste Management Transportation Plan

Dear Ms. Miskinis:

Reference is made to the May 24, 1996 announcement in the Commerce Business Daily for Expression of Interest and Comments Regarding the Office of Civilian Radioactive Waste Management Transportation Plan. Systematic Management Services, Inc. (SMS) would like to receive additional information, including draft solicitation documents, as soon as they become available.

The point of contact for SMS is:

Mr. Eric Dangle
Manager, Business Development
Systematic Management Services, Inc.
20201 Century Boulevard
Germantown, MD 20874
(301) 353-0072 Phone
(301) 353-9035 FAX

Thank you.

Sincerely,

Cheryl Dunham
Proposal Administrative Specialist

/cd

"Controlling The Future"



TRANSNUCLEAR, INC.

June 17, 1996

Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

Attention: DOE/HR-561.21

Subject: Expression of Interest and Comments on DOE's Notice of Waste Acceptance, Storage, and Transportation Services, FR Doc. 96-13244, dated 5-24-96.

Dear Ms. Miskinis;

Transnuclear, Inc. is pleased to submit this Expression of Interest and Comments on the subject Notice. Transnuclear, Inc. provides specialized services and equipment for the nuclear fuel cycle that support transportation, storage, and handling of spent nuclear fuel, radioactive waste, and other radioactive materials. Transnuclear, Inc. also manages transportation operations involving various categories of radioactive materials, including spent fuel assemblies. Transnuclear, Inc. was incorporated in the State of New York in 1965.

Transnuclear, Inc. is interested in participating in the Office of Civilian Radioactive Waste Management's Services of Waste Acceptance, Storage, and Transportation. Transnuclear, Inc.'s qualifications for such participation are discussed below.

Transnuclear, Inc. has been involved in the design, analysis, fabrication, testing, certification and operation of numerous packagings for spent fuel, radioactive waste, and other radioactive materials for more than three decades. During this time Transnuclear has developed and demonstrated the full capabilities required for successful support of customer needs for procurement and operation of spent fuel packagings, and transportation and storage systems. This expertise is not limited to the packagings themselves, but extends to all considerations needed for operation, such as canister lifting and handling equipment, vacuum drying equipment, transport frames and trailers, operating procedures, training, and quality assurance.

Transnuclear, Inc. is a member of the international Transnuclear Group, a worldwide organization of affiliated companies employing more than 100 engineers with special expertise in fuel cycle engineering, operations and transportation. The Transnuclear Group has operations in France, the United Kingdom, Belgium, Spain and Japan in addition to the United States.

Transnucleaire, the parent company of Transnuclear, Inc., along

FOUR SKYLINE DRIVE • HAWTHORNE, NEW YORK 10532-2176

TELEPHONE: 914-347-2345 • FAX: 914-347-2346



TRANSNUCLEAR, INC.

June 17, 1996

Michelle Miskinis
Contracting Officer
U.S. Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

Attention: DOE/HR-561.21

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FOUR SKYLINE DRIVE • HAWTHORNE, NEW YORK 10532-2176

TELEPHONE: 914-347-2345 • FAX: 914-347-2346

with Nuclear Transport, Ltd. (NTL), also a member of the Transnuclear Group, is responsible for the transportation of spent fuel to reprocessing facilities in France and England from various countries in Europe. These organizations are also responsible for the design, testing, and manufacture of transport packages, transportation of spent fuel and other radioactive materials and products throughout the world. Transnucleaire also maintains an extensive cask maintenance facility. Transnuclear works with both of these organizations for shipments into and out of the US.

Transnuclear, Inc., in close cooperation with other members of the Transnuclear Group, has developed innovative nuclear material transport and storage systems since its formation. The Group pioneered the use of dry transport of spent fuel, the only method now being used in the United States.

Transnuclear, Inc. is well qualified to participate in the OCRWM Waste Acceptance, Storage, and Transportation Services operations based on experience and expertise developed from many years of planning and implementing utility spent fuel transportation projects and in providing spent fuel transport and storage cask designs and hardware to both utilities and government contractors.

Transnuclear, Inc.'s capabilities relative to transportation operations include successful interactions with utilities as the shippers of spent fuel and with utilities and DOE-operated facilities as the receiver of the spent fuel assemblies; successful interactions with local, state, and federal authorities in development of transportation routes and security measures; and interactions with carriers in achieving cost effective carrier services. Interactions with utilities include loading site surveys; design and fabrication of facility/package system interface equipment; training and supervision of utility operations staff in the handling, loading, and preparation for shipment of packages; and intermodal and standard truck, rail, and ship transportation planning and implementation.

Transnuclear Inc.'s capabilities relative to design, licensing, and fabrication of spent fuel casks is extensive and ranges from design and fabrication of its own TN-8 and TN-9, TN-BRP and TN-REG, and TN-FSV transportation casks to the design and fabrication of the TN-24, TN-40, and TN-32 spent fuel storage casks. In addition to the extensive interactions with utility staff in the design, licensing, procurement, and operation phases of these projects, Transnuclear, Inc. has many man-years of NRC licensing experience based on these designs.

In addition, Transnuclear, Inc., has developed designs of equipment for spent fuel handling, including the EPRI/DOE Dry Transfer System for spent fuel transfer from one cask to another.

These projects are summarized below and are detailed in the

attached Capabilities and Experience document.

Transnuclear, Inc. has dealt with federal, state and local governments as well as law enforcement officials for more than 25 years in all areas related to safety and security for the transport of radioactive material.

A summary of Transnuclear, Inc. spent fuel transportation and cask fabrication projects is included as an attachment to this letter.

Transnuclear, Inc. is interested and qualified to participate in the OCRWM program discussed in the referenced notice. We would be pleased to discuss our ideas in more detail with the OCRWM at any time. Please include Transnuclear, Inc. in all future communications regarding this program.

Further correspondence should be addressed to the undersigned.

Yours truly,



Alan S. Hanson
President and CEO

Enclosures (3)