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Interim Storage Partners Consolidated Interim Storage Facility Project

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Comment on FR Doc # 2020-09795

## **Submitter Information**

Email: rhernandez@nctcog.org **Government Agency Type:** Local

Government Agency: North Central Texas Council of Governments

## **General Comment**

See attached file(s)

## **Attachments**

NCTCOG Comments 11022020



November 2, 2020

Office of Administration
Mail Stop: TWFN-7-A60M
ATTN: Program Management
Announcements and Editing Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear U.S. Nuclear Regulatory Commission Staff:

The North Central Texas Council of Governments (NCTCOG) serves as the 12-county Metropolitan Planning Organization (MPO) for North Central Texas, which is centered around the two urban centers of Dallas and Fort Worth. As the region's MPO, NCTCOG is responsible for transportation planning for the entire region. Part of these responsibilities include planning for goods movement, including rail and roadway planning, through our long-range metropolitan transportation plan. NCTCOG would like to submit comments on the United States Nuclear Regulatory Commission notice published in the May 8, 2020, Federal Register, Docket ID NRC-2016-0231.

North Central Texas has significant rail activity throughout the region. Three Class 1 and two short line railroads, three commuter rail operations and Amtrak all use a shared rail network to move passengers and goods through the region. The increasing number of train operations in the system network has led to rail congestion and delay that clearly limits the amount of rail traffic the network can support. NCTCOG and its regional rail partners understand that these issues need to be addressed to meet current and future rail movement demands. To that end, NCTCOG and its rail partners are investing in a Regional Rail Information System (RRIS). The implementation of a regional rail information system will allow for the timely exchange of accurate information between the rail agencies within the region.

NCTCOG supports the safe and expedited movements of all goods through the region. The use of proper safety protocols and designated routes will allow hazardous material including spent nuclear fuel and greater-than Class C waste to move through the region without stoppage or delay. The federal government, through the Fixing Americas Surface Transportation (FAST) Act, has required more information sharing about the class of hazardous materials that move through cities and counties. RRIS technology can benefit a wide variety of rail issues including tracking the movement of hazardous materials that come into, out of and through the region. To ensure hazardous materials, move through the region expeditiously and safely as possible, the RRIS can be a great resource in helping the railroads and local authorities (hazardous material responders and other first responders) communicate. Hazardous material shipment information can be shared in real time with applicable agencies. Thus, hazardous material movement can move through the region with the safety, visibility and precautions needed. The tracking of hazardous material would be an enhancement to the existing RRIS system.

Even though we are moving ahead with an integrated System anyway, Federal interests should consider large metropolitan regions along the route be required and Congress pay for Regional Rail Information System technology as a condition of this action. This hazardous material tracking enhancement option would reduce health and security risk from spent nuclear fuel and greater-than Class C waste being exposed to citizens along the route. The cost of such systems is very cost effective and have tremendous broader benefits to the community.

Further contact can be made to Michael Morris, P.E., staff director of the NCTCOG Regional Transportation Council, at mmorris@nctcog.org.

Sincerely,
Whe Sanderd

Mike Eastland Executive Director

JH:lk

cc: Michael Morris P.E., Director of Transportation, NCTCOG