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Secretary of the Commission,  
U.S. Nuclear Regulatory Commission,  
Washington, DC  
20555-0001

Office of  
Regulatory  
Administration

Attention: Rulemakings and Adjudications Staff

Subj: **COMMENTS BY CLARK COUNTY NEVADA IN SUPPORT OF Nevada's Petition To Institute Rulemaking To Amend Regulations Governing Safeguards for Shipments of Spent Nuclear Fuel (SNF) Against Sabotage and Terrorism and To Initiate A Comprehensive Assessment**

Dear Dr. Jackson:

Clark County, Nevada endorses the State of Nevada's request that the Commission initiate rulemaking to reexamine and strengthen regulations governing safeguards for shipments of spent nuclear fuel against sabotage and terrorism.

The standards for safety and security have not been reviewed in nearly two decades. During this time, drastic changes have occurred in the nature and characteristics of the threat to spent nuclear fuel. The Commission must modify existing regulations to account for the changing nature of threats posed by domestic terrorists, the increased availability of advanced weaponry and the greater vulnerability of larger shipping casks traveling across the country.

Clark County urges the Commission to conduct the needed risk and consequence assessment of the existing safeguards and security regulations to determine if changes need to be made, publish new proposed rules for public comment, and ultimately to make the necessary modifications to the regulations. If you need additional information concerning this vital matter, please contact Dennis Bechtel at (702)455-5175.

Cordially,

Myrna Williams  
County Commissioner  
Clark County, Nevada  
500 S. Grand Central Parkway  
Las Vegas, NV 89155

U.S. Nuclear Regulatory Commission  
Washington, DC 20540-0001

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