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NUCLEAR ENERGY INSTITUTE

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March 15, 1999

DOCKET NUMBER  
PROPOSED RULE PR 72  
(64FR1542)

Mr. John C. Hoyle  
Secretary of the Commission  
Rulemaking and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** Industry Comments on Proposed Rulemaking to Part 72,  
List of Approved Spent Fuel Storage Casks: Addition  
"Future Rule Making Procedures-Direct Final Rules,"  
(64 Fed. Reg. 1542-January 11, 1999)

The Nuclear Energy Institute offers the following comments in response to the subject *Federal Register* notice which solicited public comments on "Future Rulemaking Procedures," which considers publishing future revisions and additions to 10CFR72.14 as direct final rules.

Over the next 10 years more than 25 operating plants will lose their full core off-load capacity requiring dry storage as the only alternative. It is imperative that the regulatory process be streamlined when there is no adverse safety concern. We commend the Commission for its initiative to eliminate unnecessary regulatory requirements. This process change would permit the NRC to publish the proposed addition or revision to the list as both a proposed and final rule simultaneously. If the NRC does not receive significant adverse comments on the direct final rule within 30 days the proposed rule will become effective 75 days after proposed rule publication in the federal register.

If you have any questions concerning these comments, please contact me at (202) 739-8109 or Alan Nelson at (202) 739-8110.

Sincerely,



Lynnette Hendricks