

August 22, 2000

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Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Rulemaking and Adjudications Staff
Subject: Docket PRM-72-5
NEI: Receipt of Petition for Rulemaking

DOCKET NUMBER
PETITION RULE PRM 72-5
(65FR 36647)

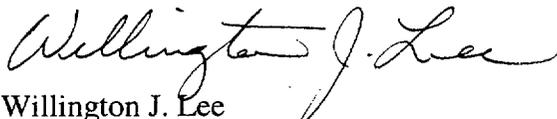
NAC International is in a unique position to provide comments on the NEI's Petition for Rulemaking. NAC is the holder of several transport and storage Cask Certificates of Compliance approvals under 10 CFR 71 and 10 CFR 72, respectively. These casks include:

71-9225	NAC-LWT
71-9235	NAC-STC
72-1013	NAC-STC
72-1025	NAC-MPC
71-9270	NAC-UMS (under review)
72-1015	NAC-UMS (pending final rulemaking)

NAC fully supports the NEI petition for rulemaking. With the number of amendments NAC has already submitted and is planning to submit, NAC fully recognizes the need to improve and streamline the 10 CFR 72 Rulemaking process, so as to reduce the regulation burden of the final rulemaking process. NAC agrees amendments having "no significant impact consideration, will be a significant number and the proposed change will allow this use of a more efficient process." This proposed revised process would still provide for public participation, while streamlining the rulemaking process. The elimination of maintaining a list of approved cask designs is also consistent with 10 CFR 71 in which there is no such listing required in the regulation.

NAC is pleased to provide these comments in support of the proposed changes. If any additional discussion is desired, please contact the undersigned at 678-328-1230.

Sincerely,



Wellington J. Lee
Vice President & Chief Engineer
NAC International

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