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WORLD NUCLEAR TRANSPORT INSTITUTE

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September 29, 2000

Ms. Annette L. Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Attention: Rulemaking and Adjudications Staff

RE: MAJOR REVISION TO 10 CFR PART 71: COMPATIBILITY WITH
ST-1 – THE IAEA TRANSPORTATION SAFETY STANDARDS – AND
OTHER TRANSPORTATION SAFETY ISSUES

Dear Ms. Vetti-Cook:

The World Nuclear Transport Institute (WNTI)¹ is submitting the following comments on the Major Revision to 10 CFR Part 71: Compatibility with ST-1 – The IAEA Transportation Safety Standards – and Other Transportation Safety Issues, as published in the July 17, 2000, *Federal Register*. WNTI supports the U.S. Nuclear Regulatory Commission’s efforts to incorporate ST-1 into 10 CFR Part 71 and will forward separately within the next few days, two papers that the Institute is producing on the continued safe use of packagings (commonly referred to as “grandfathering”) and harmonization issues. WNTI is submitting these documents to the IAEA for its consideration.

Established in 1998, WNTI’s purpose is to promote sound and objective principles for ensuring that radioactive materials are transported safely, reliably and within a secure international framework. In the interest of serving that objective, WNTI has observer status at the International Atomic Energy Agency (IAEA) and consultative status at the International Maritime Organization (IMO). WNTI was invited to take part in the IAEA Transport Safety Standards Advisory Committee (TRANSSAC) and has been actively participating in the ongoing ST-1 implementation and revision process at the IAEA.

¹ WNTI currently represents 34 member companies from Europe, North America and Japan. Its membership includes nuclear transporters, package designers and builders, enrichment services providers, fuel fabricators, uranium producers and converters, uranium trading companies, and waste management companies, all of whom rely on nuclear transport either with or through the U.S. and, therefore, must comply with U.S. regulations. Many WNTI Members are NRC licensees.

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International transport is a truly global business and the demands on transport of radioactive materials are growing, which means that it is increasingly important that regulations affecting the safe, reliable movement of radioactive materials around the world are applied and adopted with the greatest degree possible of co-ordination and uniformity. By 2001, ST-1 will be the foundation for the international transport safety regime. Adoption of these standards by the United States will be important to maintaining and promoting compatibility and continuity in the interest of continued, safe transport of radioactive materials.

The papers to follow address specific transitional issues and we hope you will find them helpful in your consideration of ST-1 adoption. If you would like to discuss either paper or have any comments or questions, please do not hesitate to contact me directly or through WNTI's North American office at (301) 652-5105.

Yours sincerely,

Sten Bjurström

Sten Bjurström
Secretary General