



PECO NUCLEAR

A Unit of PECO Energy

DOCKET NUMBER
PROPOSED RULE PR

71

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(65 FR 44360)

Nuclear Group Headquarters
200 Exelon Way
Kennett Square, PA 19348

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September 28, 2000

Secretary
U.S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

Subject: Comments Concerning the Major Revision to 10 CFR Part 71: "Compatibility With ST-1, The International Atomic Energy Agency Transportation Safety Standards and Other Transportation Safety Issues Paper" (65FR44360, dated July 17, 2000)

Dear Sir/Madam:

This letter is being submitted in response to the Nuclear Regulatory Commission's (NRC) request for comments concerning the major revision to 10 CFR Part 71: "Compatibility With ST-1, The International Atomic Energy Agency Transportation Safety Standards and Other Transportation Safety Issues Paper", which was published in the Federal Register (i.e., 65FR44360, dated July 17, 2000). The NRC is considering a rulemaking that would revise the Commission's regulations on packaging and transporting radioactive material to make it compatible with the International Atomic Energy Agency transportation standards as well as codify other standards.

PECO Energy appreciates the opportunity to comment on the major revision to 10 CFR Part 71, and offers the following comments for consideration by the NRC.

Comments:

Changing Part 71 to SI units

Currently, shipment paperwork and associated documentation is reported in both SI and English units. This approach is desirable to the nuclear industry because it allows personnel involved in the shipment of radioactive material the ability to effectively communicate with organizations (such as Health Physics) which continue to operate and report dose rate and activity information in English units. These organizations have yet to convert to the SI system. Complete conversion of 10 CFR 71 at this time would become a hardship to the nuclear industry in the United States. Radioactive material shippers would be required to constantly convert information provided to them in order to prepare shipping papers (this would also be required of incoming shipments to convert to values used by the balance of plant personnel). This additional activity will lead to an increase in errors on shipping paperwork and ultimately may cause situations that may increase risk to the health and safety of the public. Therefore, PECO Energy does not recommend that full conversion to SI units be included in this revision to 10 CFR 71.

Template = SECY-067

SECY-02

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If you have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script that reads "J. A. Hutton, Jr." followed by a stylized flourish that appears to be "FUR".

James A. Hutton, Jr.
Director - Licensing