



PR 73
(75FR62695)

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USNRC

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January 6, 2011 (3:35 pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

5 January 2011

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

Re: Docket ID: NRC-2009-0163
10 CFR Part 73 Physical Protection of Irradiated Reactor Fuel in Transit
Proposed Rule

To Whom It May Concern:

We are writing in response to the NRC request for comments on the above referenced proposed rule changes.

73.37 (b)(3)(ii) – “The movement control center must be staffed continuously by at least one individual ...who has the authority to direct the physical protection activities.”

Comment: STS has concerns that this verbiage will require a representative from each LLEA along any given route to be at the movement control center during transport while in their jurisdiction. We feel the staff at the movement control center should have the authority to contact and seek assistance from LLEA, but they cannot “direct” LLEA efforts.

73.37 (b)(3)(vii)(B) – “Provide that shipment escorts make calls to the movement control center....”

Comment: STS requests that NRC consider changing the language to allow contact with the movement control center by persons other than the escort and by means other than calls. For example, where team drivers are used, the resting driver may be able to make contact with the movement control center rather than the escort. Additionally, the “call” can be a satellite message rather than voice communications. A “macro” message sent via satellite is safer and more secure than voice exchanges, as it gives exact locations without being overheard, and it’s a single push of a button vs. dialing a phone.

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73.37 (c)(2) – "...all armed escorts are equipped with a minimum of 2 weapons. ..."

Comment: STS requests that NRC define the term "weapon". Are duplicate weapons acceptable? For example, are two side-arms acceptable, or do the weapons need to be different, i.e. a hand gun and a long gun?

Please feel free to contact the undersigned or Roy Boy at our Atlanta office, 770-932-4166.

Sincerely,

A handwritten signature in black ink, appearing to read "Blake R Williams", with a stylized flourish at the end.

Blake R Williams
President

Rulemaking Comments

From: Blake Williams [brw@securedtransportationservices.com]
Sent: Wednesday, January 05, 2011 2:12 PM
To: Rulemaking Comments
Cc: Roy Boyd
Subject: NRC-2009-0163 Proposed Rule, Physical Protection in Transit
Attachments: NRC Comments 110105 Phys Prot.pdf

Please see the attached letter for comments concerning the proposed rulemaking.
Thank you.

Blake R Williams

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Thread-Index: AcutDGwXgzKbB8igR2aK12+crnWCWQ==
From: Blake Williams <brw@securedtransportationservices.com>
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CC: "Roy Boyd" <rab@securedtransportationservices.com>
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