TENNESSEE VALLEY AUTHORITY
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(45)

DOCKET NUMBER
PROPOSED RULE PR -73 (44FR 34466)

August 17, 1979

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Sir:

In response to the June 15, 1979, Federal Register notice (44 FR 34466-34468), the Tenneseee Valley Authority (TVA) is pleased to provide comments on the amendment to 10 CFR Part 73 and NUREG-0561, "Physical Protection of Shipment of Irradiated Reactor Fuel" which provides interim requirements for the protection of spent fuel in transit. We support the objective of providing sufficient protection of spent fuel in transit to protect the health and safety of the public. We offer the following comments for your consideration in the development of the final regulation.

We believe that the cost figures, stated as an increase of approximately $200,000 per year for the estimated 200 annual shipments involved, need further clarification. With approximately 70 reactors operating and over 90 under construction in the U.S., we believe 200 annual shipments may be low by a factor of 10 or more in the late 1980's. Although this estimate may be reasonable for present shipping conditions, we believe the number of shipments could substantially increase in the future. As an example, to accommodate the anticipated annual spent fuel discharges from the 17 reactors TVA has operating or under construction would require over 150 annual rail shipment or substantially more truck shipments. Increasing the storage capacity at a plant site could significantly reduce the number of shipments before 1990, however, this may only defer and not eliminate an ultimate need for shipping.

We support routing to avoid, where practicable, heavily populated areas. However, great caution must be exercised in selection of such routes. When transporting by road, main arteries, such as the interstate system, generally connect major population areas. Routing to secondary roads could significantly increase probability of accidents since such roads are generally not as well maintained and compound difficulties in obtaining assistance,

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if required. Similarly, when transporting by rail, routing around heavily populated areas could substantially increase the total distance traveled and result in use of less well-maintained rail lines with possible impact on probability of derailment or other accidents.

The escorts required by Section 73.37(a)(2) will require that arrangements be made with all law enforcement agencies along the route and would also involve State radiological health and civil defense agencies. This would involve many contacts for long distance shipments. We recommend that this number of contacts be minimized by the NRC working with the State for the development of only one agency contact in each State.

The use of approved routes, notification of law enforcement agencies and other organizations along the route, and frequent communications, are no doubt necessary but we should try not to aid any potential saboteur. For example, the use of the CB radio should be confined to requests and general public notification of road and traffic information. Use of these frequencies for movement-control purposes would be too unreliable and jeopardize movement security.

Finally, in Section 73.37(b)(3), we believe caution should be exercised in the selection of features which permit immobilization of vehicles. Reliability of such features is extremely important. Inadvertent actuation could result in accident.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
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Secretary of the Commission August 17, 1979

cc: Executive Secretary
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