

GENERAL ELECTRIC

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NUCLEAR ENERGY
BUSINESS GROUP

GENERAL ELECTRIC COMPANY, 175 CURTNER AVE., SAN JOSE, CALIFORNIA 95125

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File FDF: 79

DOCKET NUMBER

PROPOSED RULE

PR-71(44FR48235)
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Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Subject: Packaging of Radioactive Material for Transportation
and Transportation of Radioactive Material Under Cer-
tain Conditions; Compatibility with IAEA Regulations



Gentlemen:

General Electric as an international shipper of radioactive material feels very strongly that issuance of compatible regulations with the IAEA Safety Standards Safety Series No. 6, Regulations for the Safe Transport of Radioactive Materials 1973 Revised Edition and subsequent amendments adopted in May 1975 and December 1977 will greatly reduce inconsistencies with foreign regulations, and thereby expedite international shipments.

We offer the following recommendations for your consideration:

- A) Appendix B - Hypothetical Accident Conditions-allows no cooling or extinguishing of fire after three hours duration of the thermal test. This is justified by saying "Three hours may be inadequate for control of fire even in populated areas. Also, unrecognized smoldering may continue for a much longer time." We find this reasoning extreme. Further, it is proposed to require consideration of solar insolation following the initial 30-minute test period. While this can be accommodated, it is a significant complication to the analytical work, and we expect the difference in results will be miniscule.
- B) In Appendix C - Determination of A₁ and A₂ - Table C-1 A₁ and 2 Values for Radionuclides, the quantity for Cs-135 should be A₁ 1000 Ci. and for A₂ Value should be 100 Ci.
- C) The definition of "Depleted Uranium" as less than 0.72% U-235 content may cause some confusion, e.g. the variations in the U-235 content of natural uranium in various areas of the world, and the fact that for purposes of material accountability, natural uranium is considered to be 0.7111%. The definition should be amended to read as similar to that found under Part 40 of Title 10.

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Acknowledged by card. 12/29/79

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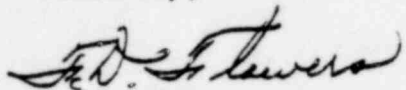
- C) "Depleted Uranium means the source material uranium in which the isotope U-235 is less than 0.711 weight percent of the total uranium present. Depleted uranium does not include special nuclear material."
- D) Following this thinking, the definition for "enriched uranium" should be - "Enriched Uranium shall mean uranium containing more than 0.7111% U-235, with the remainder essentially U-238".

If the statement "In all cases a very small amount of U-234 is present" as found in the IAEA 1973 regulations is true, it should be added to the definition.

- E) "Natural Uranium" means chemically separated uranium with the naturally occurring distribution of uranium isotopes (approximately 99.2889 percent uranium-238 and 0.7111 percent uranium-235).

We hope these comments will be evaluated when you finalize this proposed rulemaking.

Sincerely,



F. D. Flowers, Manager
International Traffic &
Hazardous Materials

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