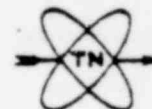


TRANSNUCLEAR, INC.



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



August 15, 1979

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

Attention: Docketing and Service Branch

Subject: Comments on Interim Final Rule for the Physical  
Protection of Irradiated Reactor Fuel in Transit,  
10CFR 73.37, (44FE34466, June 15, 1979)

Gentlemen:

Transnuclear, Inc. is a nuclear fuel cycle service company specializing in all activities involving the transportation of spent fuel and other radioactive materials on a domestic and worldwide basis. For the past two years we have been responsible for shipments of spent fuel from research and test reactors in Europe to the Department of Energy's Savannah River Plant. These shipments enter the United States at Portsmouth, Virginia and are trucked to the DOE facility near Aiken, South Carolina. All shipments have been made safely, with no problems and, until recently, without opposition from anyone.

Transnuclear considers that the NRC, by requiring almost immediate implementation of the Rule, has created a public concern by overreacting to the remote possibility of an undefined and ambiguous threat. We believe the Rule is not required or justified and should be modified significantly before being put in final form.

We endorse the comments submitted by the Transportation Subcommittee of the Atomic Industrial Forum's Fuel Cycle Services Committee and offer the following additional recommendations and suggestions.

The Rule as written applies to any quantity and any type of irradiated reactor fuel. The Rule should impose lesser requirements on packages containing small specimens of irradiated fuel than the requirements imposed on packages containing a ton or more of irradiated fuel. Likewise, the Rule should recognize that irradiated test reactor fuel almost invariably contains no free fission gas and would not in the event of a successful sabotage action have the same release consequences that irradiated power reactor fuel would.

8/21/79  
Acknowledged by card.....

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We also consider that confirmatory research should encompass light water fuel consequences (including small quantities) as well as other types of spent fuel and that the final rule should properly reflect the findings of such confirmatory research.

Transnuclear also recommends strongly that approval of requests for routes through the defined urban areas be routine if travel is to be on Interstate highways or mainline railroads. Routing of a truck on secondary roads or rail shipments over less well-maintained roadbeds will result in increased probability of accident and higher overall risk to the public. We concur with the requirement for armed escorts for road shipments when in urban areas, but do not believe armed guards other than those already provided by the railroads are needed for rail shipments in either urban or rural areas.

We will be pleased to discuss our comments with the NRC staff at anytime.

Very truly yours,

Bill R. Teer  
Vice President

/mrz

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