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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attn: Docketing & Service Branch
Washington, D.C. 20555



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Dear Mr. Secretary:

The following comments are submitted on behalf of the Citizens Against Nuclear Dangers, Berwick, Pa., interveners at NRC Docket Nos. 50-387/388; pertaining to the NRC Interim Final Rule-- 10 CFR Part 73--"Physical Protection of Irradiated Reactor Fuel in Transit."

1. A master plan should be prepared designating special rail routes for the shipment of all industrial radioactive spent-fuel cargoes sent to atomic fuel reprocessing plants, and atomic fuel wastes storage sites.
2. These rail routes should circumvent all cities, even where it would require building new tracks to bypass urban areas in order to reach the designated storage plant sites. (We would rule out, as inherently unsafe, motor truck transport as a substitute mode.)
3. All roadbeds along these routes should be rebuilt, and aligned wherever necessary to reduce curves and steep grades, etc.
4. All rail sections on these routes should be replaced with the new more reliable welded lengths, able to carry the heavier loads of the specially built tankers.

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5. The tankers should also be improved for greater safety, and each one periodically x-ray tested for leaks.
6. Radar equipment should be installed along this entire right-of-way, as well as, the most advanced switching and signaling equipment. Microwave communication networks should be installed also, to aid in overall traffic control.
7. Pipelines moving hazardous substances should not be allowed parallel to these special rail routes.
8. Continual monitoring of the trackage by mobilized electrostatic seismic plotters to detect structural weaknesses and warn against derailments should be a requirement.
9. All train crews should receive special training in the handling of atomic cargoes; and D.O.E. radiologists and para-medical personnel wearing protective gear should be on board all trains carrying radioactive waste materials, fully equipped and prepared to seal-off an area if a leak occurs and carry out decontamination procedures.
10. An armed security force traveling in an armored locomotive should precede each atomic waste cargo train--inspecting every viaduct, tunnel, overpass, grade crossing and bridge, etc., and fully prepared to protect the train against all contingencies. Helicopter surveillance should also be part of this security program.

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11. When a train carrying a radioactive spent-fuel cargo is in transit over one of the designated routes, all other trains in the vicinity should come to a halt. No other freight should be aboard the atomic cargo trains. In addition, the air space along these routes should be cleared whenever a scheduled run is in progress. Reduced speeds and limited quantities of radioactive wastes should be the rule on these trains.

12. Installation costs, operating costs, and all other related expenditures of this rail service should be paid for on a pro rata basis by the shippers of industrial radioactive waste products. The chief users of this service are the electric companies who operate atomic power plants. Keep in mind that contracts to purchase irradiated fuels often exceed \$100 million, and a few million more annually in the form of a fuel transportation charge levied by the rail carriers can be viewed as a reasonable and necessary operating expense by the utilities.

In conclusion, we urge the requirement and implementation of the plan generally outlined above as part of the Final Rule (10 CFR Part 73 etc.); to serve as an important safeguard to protect the public health and safety of the nation.

Yours truly

Thomas J. Halligan
Correspondent

cc: Mr. L.J. Evans Jr.
Regulatory Improvements Br.
Div. of Safeguards

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