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STATE OF NORTH CAROLINA  
OFFICE OF THE GOVERNOR  
RALEIGH 27611

JAMES B. HUNT, JR.  
GOVERNOR

August 15, 1979



Dear Mr. Secretary:

I want to share with you North Carolina's comments on the Nuclear Regulatory Commission's proposed rules concerning the shipment of high-level radioactive wastes.

The State of North Carolina supports the intent of the U.S. Nuclear Regulatory Commission's proposed interim Rule 10 CFR 73.37, "Requirements for Physical Protection of Irradiated Reactor Fuel in Transit." Our understanding of the intent of the proposed interim rule is that it requires precautions and safeguards to be taken to ensure against potential sabotage which could be directed against irradiated reactor fuel shipments and which, if successful, could threaten the general population, particularly in urban areas, with radioactivity exposure.

The State of North Carolina believes that the purpose and intent of this proposed rule could be furthered by the NRC's specifying and requiring that only the shortest practical transportation routes be utilized. Requiring the shortest land distances for transportation should minimize sabotage potential and any resulting exposure risk to the general population. This is particularly true where irradiated reactor fuel shipments are being received from overseas and importation into ports nearest storage destination could minimize required land transportation distance. Entry of irradiated reactor fuel shipments into ports requiring excessive overland haulage should be prohibited, with the guidelines specifying that ports requiring the shortest practicable land transportation routes be utilized for receipt of overseas shipments.

We appreciate the opportunity to offer these comments on the Commission's proposed interim rule.

My warmest personal regards.

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Sincerely,

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
ATT: Docketing and Service Branch

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Acknowledged by card 8/21