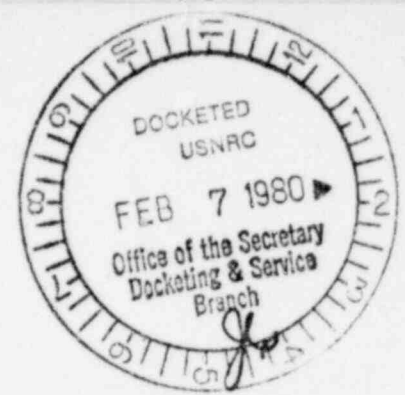


DOCKET NUMBER
PROPOSED RULE

②
PR-70,73(45FR:625) January 24, 1980



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

Attn: Docket & Service Branch

With regard to the proposed rule amending 10 CFR Parts 70 and 73 published in the Federal Register on Tuesday, January 8, 1980 (45FR1625) I disagree with your finding that there is no need for either an environmental impact statement or an environmental impact appraisal. It is not at all apparent that you have considered the impact this proposed rule will have on commerce, i.e., the lost opportunities due to cargo ships avoiding U.S. port's and the increase in freight charges to receivers of non-nuclear merchandise received from a ship carrying "trans-cient" shipments of SSNM.

Further, it does not appear that you have considered the increased risks to the environment from a postulated, and somewhat clandestine, at-sea transfer of the SSNM to avoid the increased costs of docking occasioned by the rule you propose.

Again it appears as if you have not considered the possible side effects of your proposed action and I encourage you to do so through the development of an environmental impact statement.

Respectfully,

A handwritten signature in cursive script, appearing to read "H. A. Zimmerman".

H. A. Zimmerman

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