

# GENERAL ELECTRIC

NUCLEAR ENERGY  
BUSINESS GROUP

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

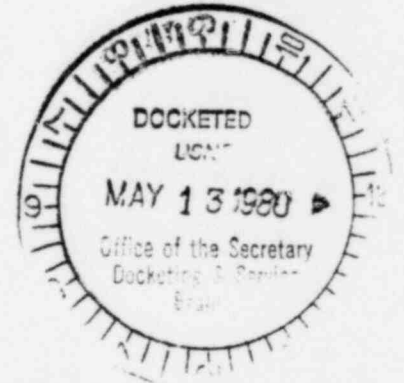
May 7, 1980  
Docket Number  
PROPOSED RULE **PR-70 (2)**  
**(45 FR 15936)**

File FDF: 80-79

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

Attention: Docketing and Service Branch

Subject: Proposed Rule - Domestic Licensing of Special Nuclear Material; General License Requirements for Any Person Who Possesses Irradiated Special Nuclear Material (SNM) In-Transit



Gentlemen:

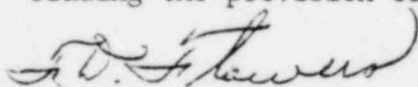
The Nuclear Energy Business Group of the General Electric Company has reviewed the proposed rule to Title 10 CFR, Part 70 as published in the Federal Register of March 12, 1980.

We do not generally oppose this rulemaking, if it does codify practices and procedures now submitted to on a voluntary basis by the carriers. However, we strongly object to this general license being subject to the provisions of 70.42, "Transfer of special nuclear material", on the following grounds.

The shipper, as a licensee, is already subject to these provisions. The redundancy to these regulations accomplishes nothing, except increasing the bureaucratic nightmare that is growing rapidly to cover the shipping of irradiated reactor fuel.

The purpose of the proposed 70.20 (a), is seen as a mechanism for inspection during transit for proper physical protection. Imposition of the requirements of 70.42 and specifically 70.42 (c) and (d) on the carrier, does not add to the physical security, and is envisaged to increase the cost of shipment.

We, therefore, recommend the NRC modify this proposed rule by excluding the provision of 70.42 (c) and (d) in its entirety.



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

Acknowledged by card. 5/20/80 mdv...

FDF/MJC:sh

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