



STATE OF NEVADA
DEPARTMENT OF HUMAN RESOURCES

CAPITOL COMPLEX
ROOM 600, KINKEAD BUILDING
505 E. KING STREET

CARSON CITY, NEVADA 89710

TELEPHONE (702) 885-4730

August 20, 1980

DEPARTMENTAL
DIVISIONS

- AGING SERVICES
- HEALTH
- MENTAL HYGIENE-
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ROBERT LIST
GOVERNOR

RALPH R. DISIBIO, Ed.D.
DIRECTOR

M-31

Mr. Wayne Kerr
Assistant Director for
State Agreement Programs
Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Kerr:

This is in response to your letter of August 5, 1980, in which you ask Nevada's position on notification of the Governor of all shipments of radioactive waste requiring transport in a Type B package, coming into or transversing the State.

We believe that the notification proposed by NRC may be useful but does not go far enough. For instance, a State Legislative Subcommittee plans to propose legislation requiring shippers of radioactive waste (in any quantity) to give prior notification of its entry into the State, not less than four nor more than 48 hours prior to transport of the radioactive waste into the State.

This brings up another question - why limit the notification to radioactive waste? Would it not be logical to also require notification of shipment of a similar quantity of radioactive material not classified as waste?

We note that the proposed change in the regulations does not require the shipper to identify the location at the State border where the shipment will enter the State or what routes the shipment will follow through the State. We believe that for the reported information to be useful, it must contain the point of entry and the routing through the State.

The "estimated seven day period of arrival" apparently means that the radioactive waste could arrive at the State boundary anytime in a seven day period. This type of arrangement does not lend itself to feasible inspection of the shipment at the State border.

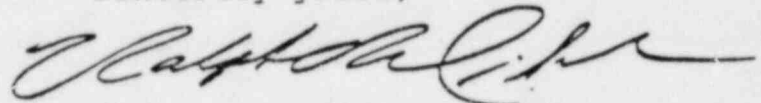
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Incidentally, we are not in agreement with the concept that Type A quantities of radioactive material could never pose a significant hazard to public health and safety. We believe that a shipment of 175 to 200 containers of Type A quantities containing thousands of curies of radioactive materials totally involved in an accident such as a large conflagration, could constitute a significant health hazard to the public in an urban environment.

Sincerely yours,



Ralph R. DiSibio, Ed.D.
Director

RRD/lis

cc: John Vaden