

# GENERAL ELECTRIC

DOCKET NUMBER

PROPOSED RULE

PR-73

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NUCLEAR ENERGY

BUSINESS GROUP

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

March 3, 1981

File FDF: 81-56

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



Subject: Proposed Rule; Advance Notification  
to Governors Concerning Shipments  
of Irradiated Reactor Fuel

Federal Register/Vol. 45, No. 238/  
Tuesday, December 9, 1980/FR Doc. 80-37956

Gentlemen:

This letter is in response to the proposed rule set forth in Federal Register dated December 9, 1980, requiring Advance Notification to Governors Concerning Shipments of Irradiated Reactor Fuel.

We request you to refer to our comments regarding Protection of Unclassified Safeguards Information and letter FDF:81-54 dated March 3, 1981, and Advance Notification to States of Transportation of Certain Types of Nuclear Waste, letter FDF: 81-55 dated March 3, 1981.

It is stated that newly enacted paragraph 147 of the Atomic Energy Act provides that a civil penalty can be assessed against a person who discloses schedule information without proper authorization, or who fails to carry out the information protection requirements. If the above occurred, it would seem to be very difficult to prove.

73.37(f)(4) states "A licensee shall notify a responsible individual in the office of the Governor..." Where does the

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name of this "individual" come from? What assurance do we have of their reliability.

We maintain there are substantial technical problems, which hamper compliance and enforcement of this proposed rule.

*Frederick D. Flowers*

Frederick D. Flowers, Manager

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