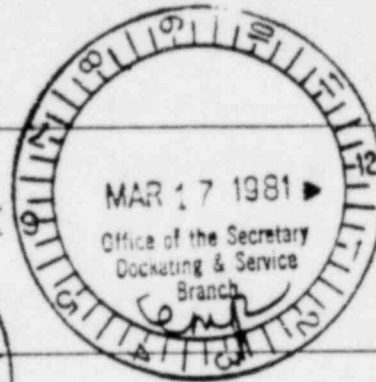


US Ecology, Inc.
P.O. Box 7246
9200 Shelbyville Road, Suite 526
Louisville, Kentucky 40207
502 426-7160



USEcology

March 9, 1981

44

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

DOCKET NUMBER
PROPOSED RULE PR-73
[45 FR 81060]

Attention: Docketing and Service Branch

Gentlemen:

This is in reference to your proposed regulation for notification of Governors on Nuclear Waste Shipments.

In a recent NRC press release, it stated "24,000 packages in 1985 may involve TYPE B packages". For each TYPE B package two notifications, one by letter and a second by messenger, would be required for each State Governor in which the shipment is transported. A conservative estimate of four (4) states would be involved in interstate transport of each shipment. Therefore, these 24,000 shipments will result in a conservative 200,000 notifications of State Governors at an expenditure of millions of dollars. This is an unconscionable cost when considering the extremely low risk associated with transport of low level radioactive materials, the excellent safety record for such shipments and that such notification would not afford a greater degree of safety.

Other specific comments are as follows:

- A. As required by law, the NRC must adopt regulations requiring notification of the Governors for specific radioactive shipments. It is important to establish a system of notifications that is less costly from a standpoint of personnel time and monetary expense. Accordingly, it is recommended that if notification is required it be made through a monthly report of all shipments to enter and originate in a State. Such a report would detail the information currently specified in the proposed rules. The scheduled time for entering a State should encompass a set time period; for example, a 72-hour period. If this time frame cannot be maintained, follow-up notification would be required four (4) days prior to actual shipment. Thus notification requirements would be met and the elaborate messenger system would be unnecessary.

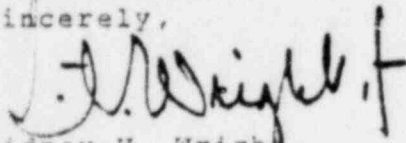
8104010174

March 9, 1981

- B. A definition of licensee should be provided to clarify who bears the responsibility to notify the Governor(s).
- C. Protection of the schedule information against disclosure is necessary for an indefinite period rather than for a "short time after shipment" to prevent deduction of future schedules by potential saboteurs.

Should you require any additional information do not hesitate to contact US ECOLOGY.

Sincerely,



Sidney V. Wright
Vice President

SVW/gh