

DOCKET NUMBER **PR 71**
PROPOSED RULE **(53 FR 21350)**

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PHILADELPHIA ELECTRIC COMPANY

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NUCLEAR GROUP HEADQUARTERS

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February 9, 1990

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, DC 20555

SUBJECT: Comments Concerning the Nuclear Regulatory Commission's Proposed Rule 10 CFR 71, "Transportation Regulations; Compatibility With Regulations of the International Atomic Energy Agency (IAEA)" (53 FR 21550).

Dear Mr. Chilk:

This letter is being submitted in response to the Nuclear Regulatory Commission's (NRC's) request for comments concerning the Proposed Rule 10 CFR 71, "Transportation Regulations; Compatibility With Regulations of the International Atomic Energy Agency (IAEA)," published in the Federal Register (53 FR 21550, dated June 8, 1988).

The Philadelphia Electric Company (PECo) appreciates the opportunity to comment on this proposed rule. The Edison Electric Institute (EEI) submitted comments on behalf of the nuclear power industry regarding the proposed changes to 10 CFR 71. PECo fully supports EEI's position and comments concerning this proposed rule.

As described in a proposed change to 10 CFR 71.10, Type A - Low Specific Activity (LSA) material packages would be restricted to the quantity 2A1. This would result in an increase of Type B - LSA shipments. Currently there are not enough Type B shipping casks available to support an industry wide increase in this type of shipment. We note that the extra cost for a Type B shipping cask is at most \$3500. Furthermore, time for fabrication and licensing of new shipping casks to satisfy industry needs should be considered before promulgation of a final rule. In addition, since Type B shipping requirements are more restrictive than Type A, we estimate that the shipping costs for each of our two nuclear power stations will increase by

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approximately \$42,000 annually, assuming about 12 additional Type shipments per year.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director
Licensing Section
Nuclear Services Department