

PDR

NUCLEAR CONTROL
INSTITUTE

1000 CONNECTICUT AVE. NW SUITE 704 WASHINGTON DC 20036 202*822*8444 FAX 202*452*0892

January 24, 1994

Mr. George Brown
U.S. Department of Transportation
Radioactive Materials Branch
Office of Hazardous Materials Technology
Washington, D.C.

Mr. Michael M. Wangler
U.S. Department of Energy
Transportation and Packaging Safety Division
Office of Environment, Safety and Health
Washington, D.C.

Mr. Charles Haughney
Head, Storage and Transport Systems Branch
U.S. Nuclear Regulatory Commission
Washington, D.C.

Gentlemen:

In anticipation of the March meeting of the IAEA's Standing Advisory Group on the Safe Transport of Radioactive Material, I am writing to request a meeting to discuss with you the U.S. position on revision of IAEA Safety Series 6 with respect to air transport of radioactive materials.

For a number of years, the Nuclear Control Institute has raised safety and security concerns associated with the transport and use of plutonium. The Institute welcomes the decision by the IAEA's Standing Advisory Group on the Safe Transport of Radioactive Material (SAGSTRAM) to establish a Type C cask for air transport of radioactive material. However, we believe the proposed IAEA guidelines may not provide sufficient assurance against a release of plutonium in the event of a severe accident.

The Institute would like to see the criteria for a Type C cask brought into line with U.S. domestic regulations. The U.S. domestic standard (NUREG-0360) was established by the 1975 Scheuer Amendment, which prohibited air transport of plutonium until the Nuclear Regulatory Commission certified a package that "would not rupture under crash and blast testing equivalent to the crash and explosion of a high-flying aircraft." Two plutonium air transport casks have since been certified under these guidelines.

9402150321 940124
PDR MISC

PDR
140007

strategies for stopping the spread and reversing the growth of nuclear arms

DFB
1/0

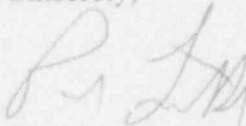
Since this law applies only to "imports, exports, and domestic shipments" but not to possible transient shipments, a second statute was enacted in 1987, the Murkowski Amendment, which requires testing a cask against "worst case" accident conditions.

We believe the U.S. delegation to SAGSTRAM should press for the adoption of international standards that are at least as rigorous as U.S. regulations, for two reasons: (1) an accidental plutonium release anywhere in the world could pollute the global environs and have health and safety consequences for American citizens, and (2) one objective of the revision is to achieve an international consensus on air transport regulations. The proposed international standard is much less stringent than U.S. domestic requirements and its adoption could put pressure on the U.S. to relax our own domestic standards. With an increase in the amount of radioactive material to be transported in the next decade, it is more important than ever that these materials be moved safely. Two crashes of military aircraft carrying nuclear weapons---in Palomares, Spain and in Thule, Greenland---have shown how dangerous and costly a plutonium-transport accident can be. An accident in a densely populated area, such as the 1992 crash of a cargo plane in Amsterdam, could have catastrophic consequences if plutonium shipping casks on board were breached.

We understand the U.S. position is to "remain neutral" on the issue of international air-transport cask standards. Further, we understand the U.S. Nuclear Regulatory Commission did not support this Administration position and so chose not to participate in the May 1993 technical consultants meeting in Vienna on Safety Series 6.

We would appreciate the opportunity to discuss these matters with you and will telephone in the hope of arranging an appointment.

Sincerely,



Paul Leventhal
President

cc: Senator John Glenn
Senator Joseph Lieberman
Representative George Miller
Representative Philip Sharp