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OFFICE OF  
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April 29, 1998

Secretary  
U.S. Nuclear Regulatory Commission  
Attn: Chief, Docketing and Service Branch  
Washington, DC 20555-0001

DOCKET NUMBER  
PETITION RULE PRM 72-12  
(63FR8362)

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Re: Petition for Rulemaking Pursuant to Provisions of 10 CFR 2.802 Regarding the "Special Requirements for Plutonium Shipments", 10 CFR 71.63, NRC docket No. PRM-71-12.

Dear Mr. Secretary:

The following comments are provided by EEG on the subject petition by Mr. Frank Falci, former DOE employee who is now President, International Energy Consultants, Inc., to relax the requirements for transportation of plutonium by deleting 10 CFR 71.63 in its entirety.

Enclosed are two EEG reports:

EEG-24 *Potential Problems from Shipment of High-Curie Content Contact-Handled Transuranic (CH-TRU) Waste to WIPP, August 1983, by Robert H. Neill and James K. Channell.*

EEG-33 *Adequacy of TRUPACT-I Design for Transporting Contact-Handled Transuranic Wastes to WIPP, June 1986, by James K. Channell, John C. Rodgers and Robert H. Neill.*

Sincerely,

Robert H. Neill  
Director

RHN:js 040024  
Enclosures(2)

cc: w/enclosures: C.R. Chappell, SFPO/NMSS

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