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COMMONWEALTH of VIRGINIA

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November 19, 1999

DOCKET NUMBER

PETITION RULE PRM 73-10
(64FR49410)

United States Nuclear Regulatory Commission
Rulemakings and Adjudications Staff
Washington, D.C. 20555-0001

Ladies and Gentlemen:

With regard to the petition filed by the State of Nevada (Docket No. PRM-73-10) regarding the threat of terrorism and nuclear shipments, the following comments are submitted:

Terrorism poses perhaps one of the most challenging threats to public safety today. The possibility of such an attack involving spent nuclear fuel and other safeguarded nuclear materials in transportation warrants serious consideration.

Changes in the nation's security programs and domestic preparedness must be based upon sound risk assessment and threat analysis. On this basis, we believe that the United States Nuclear Regulatory Commission, in conjunction with the United States Department of Energy, the Federal Bureau of Investigation, and the national security agencies, should address the issue of terrorism against nuclear shipments and storage as part of the overall domestic preparedness mission. If this analysis results in additional risk factors, only then should resources be committed to making necessary regulatory changes.

Thank you for the opportunity to comment on this important matter. If you should have any questions, you may contact Mr. L. Ralph Jones, Jr., Director, Technological Hazards Division, Department of Emergency Services, at (804) 897-6570.

Sincerely,

Michael M. Cline

MMC/LRJjr/bgm

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