

5

Roanoke Technical Center  
5000 Dominion Boulevard  
Glen Allen, Virginia 23060

DOCKETED  
USNRC

'99 NOV 22 P3:43

Office  
of  
ADJUDICATION



VIRGINIA POWER

November 15, 1999

GL99-059

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Attn: Rulemaking and Adjudications Staff

DOCKET NUMBER  
PETITION RULE PRM 73-10  
(64FR49410)

**STATE OF NEVADA; RECEIPT OF PETITION FOR RULEMAKING**

Virginia Power appreciates the opportunity to comment on the petition for rulemaking that requests the NRC amend its regulations governing safeguards for shipments of spent nuclear fuel against sabotage and terrorism. Notice of the receipt and docketing of the petition was published in the Federal Register (Vol. 64, No. 176) on Monday, September 13, 1999, pages 49410-49411. Its docket number is PRM-73-10.

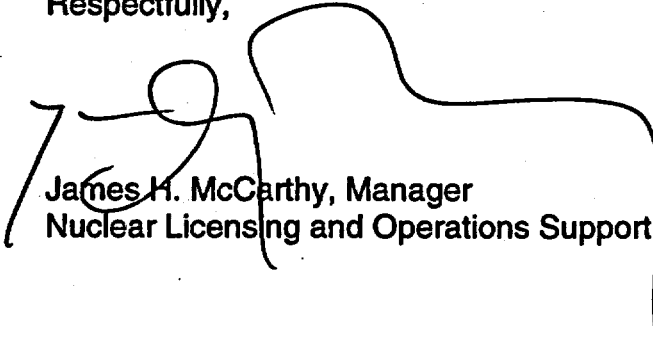
We believe that the existing regulations are adequate and no rulemaking change to 10 CFR 73 is necessary. However, any study the NRC may undertake of its regulations in response to this request for rulemaking, should consider physical protection requirements for spent fuel shipments in the context of all hazardous materials shipments and in comparison to other targets for terrorist attack.

If you need further information, please contact either:

Ed Turko                      Ed\_Turko@vapower.com or (804) 273-3018

Gwen Newman              Gwen\_Newman@vapower.com or (804) 273-4255

Respectfully,

  
James H. McCarthy, Manager  
Nuclear Licensing and Operations Support

PDR PRM 73-10

DS10