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USNRC

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STATE OF OKLAHOMA '99 DEC 16 P3:25

DEPARTMENT OF PUBLIC SAFETY

November 24, 1999

OFFICE OF
REGULATORY
ADJUSTMENT

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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

Attention: Rulemakings and Adjudications Staff

The Oklahoma Department of Public Safety agrees that assessment of safeguards during the shipment of spent nuclear fuels (SNF), and the response to emergency situations involving them, should be current.

It is our position that assessing the safeguards is the responsibility of the Nuclear Regulatory Commission(NRC). The resulting options and recommendations of safeguards by the NRC then should require final approval by the stakeholders. These safeguards should be provided by agents of the NRC and not by using state or local law enforcement officers for physical protection as suggested in the petition. The Oklahoma Department of Public Safety is always willing to assist the NRC when required but our efforts in this area should be geared more towards reactionary measures required in the event of an emergency. Physical protection of SNF shipments should be performed only by specially trained and equipped individuals for these shipments and emergency situations.

Routing and any changes in routing of future SNF should include consideration to previously spent funds for training and equipment to protect and react to emergencies that may occur. The development of those routes should involve the states and other stakeholders. If changes were to route shipments through areas where previous funds have not been spent, it would require additional equipment and training funds. Additional time to equip and train emergency response teams along new routes could delay the entire project for years.

The Oklahoma Department of Public Safety supports any effort to insure and achieve the safe shipment of these fuels. We would request that as the U.S. Nuclear Regulatory Commission addresses this issue, updates on shipping and emergency response procedures concerning these fuels be forwarded to us.

Sincerely,

Capt. Bill Hughes

Captain Bill Hughes
Zone Commander

BH/jj

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