

February 7, 2001

Myrna Williams, Commissioner
Board of County Commissioners
Clark County Government Center
500 S. Grand Central Parkway
P. O. Box 551601
Las Vegas, NV 98155-1601

SUBJECT: CLARK COUNTY COMMENTS ON NUREG/CR-6672

Dear Ms. Williams:

I am responding to your letter dated October 11, 2000, in which you provided comments on *Reexamination of Spent Fuel Shipment Risk Estimates*, NUREG/CR-6672, (the Reexamination was a Contractor Report). Your letter expressed concern about the Reexamination's review, referred to methodological flaws, stated that Yucca Mountain impacts should have been included, and requested that the Reexamination be withdrawn. Your letter also enclosed a review of the Reexamination by Matthew Lamb and Marvin Resnikov. I am sorry for the delay in responding to your letter, however, we needed some time to conduct a preliminary review of the Lamb and Resnikov comments.

We will consider your comments to the extent applicable in the ongoing Package Performance Study, and in our efforts at risk-informing our regulatory program, including the development of safety goals for non-reactor programs. Our preliminary review of the Lamb and Resnikov comments indicates that many of the "methodological flaws" appear to be related to differing views regarding some of the assumptions used in the Reexamination. Further, the comments do not appear to recognize that many of the assumptions used in the Reexamination overstate risks. Also, we have received comments that are generally favorable of the Reexamination and the related Discussion Paper. The Reexamination is a generic assessment of nationwide spent fuel shipment risks for future shipments and shipments currently underway. Since these shipments can, and do, transit most of the United States, the Reexamination is not specific to facilities or regions. Although the Reexamination might have benefitted from broader participation, for the reasons noted, we are not considering withdrawal of the Reexamination.

In your letter, you expressed appreciation for being included in the review process. I am equally appreciative of your efforts in providing your comments, and look forward to continued cooperation with Clark County in maintaining spent fuel transportation safety.

Sincerely,
/RA/ original signed by /s/
Susan F. Shankman, Deputy Director
Licensing and Inspection Directorate
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

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