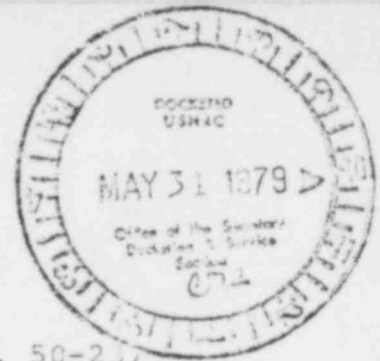


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In The Matter Of :
COMMONWEALTH EDISON CO., et al. : Dkt. Nos. 50-257
 : 50-249
 : 50-254
(Amendments to Operating Licenses for : 50-265
Spent Fuel Transportation Between :
Dresden and Quad Cities Nuclear Stations):

STATEMENT REGARDING SAFEGUARDS
FOR SPENT FUEL SHIPMENTS

I met with three members of the NRC Staff, Mr. Robert F. Burnett, Director of Safeguards, Donald Kasun and Richard Hoefling, on May 17, 1979, in Mr. Burnett's office. The purpose of the meeting was to brief me on a proposed rule designed to protect spent fuel shipments against sabotage. The proposed rule is presented in an April 18, 1979, Memorandum to the Commission (Subj: Physical Protection of Irradiated Fuel Shipments). The NRC Staff will brief the Commission on this proposed rule May 21st. The Staff will ask that it take effect immediately, and last until contract work, designed to better understand the risks of sabotage, is completed in approximately one year. While I was not shown the April 18 document, I was told in general terms what were purported to be the key elements of the proposed rule, namely:

- a) Each shipment would require 2 escorts;
- b) Periodic radiotelephone communication with a central station is required;

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- c) Avoid intermediate stops where possible;
- d) Have a procedure for coping with threats;
- e) Must be able to immobilize the truck (if shipped by truck) for at least 30 minutes;
- f) Avoid, where possible, shipments through densely populated areas;
- g) If such areas cannot be avoided, then the shipment must be made non-stop in daylight under armed escort;
- h) The NRC Staff will review all shipping plans (routes and procedures) on a case-by-case basis.

Assuming the proposed rule detailed in the April 18, 1979, report identified above was accurately represented to me in the May 17 meeting, and assuming it contains the key elements noted above, I believe the safeguards of spent fuel shipments most likely will be adequate.



Thomas B. Cochran, Ph.D.
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Natural Resources Defense Council
917 15th Street, N.W.
Washington, D.C. 20005
(202) 737-5000

Dated: May 18, 1979

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of :
:
COMMONWEALTH EDISON CO., et al. : Docket Nos. 50-237
: 50-249
(Amendments to Operating Licenses) : 50-254
: 50-265

CERTIFICATE OF SERVICE

I hereby certify that copies of NRDC RESPONSE TO
APPLICANT'S MOTION FOR RECONSIDERATION OR IN THE ALTERNATIVE
FOR CLARIFICATION AND REFERRAL and STATEMENT REGARDING
SAFEGUARDS FOR SPENT FUEL SHIPMENTS were mailed today,
May 22, 1979, first class, postage prepaid, to:

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing and Service

Richard Goddard, Esq.
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