

DOCKET NUMBER PR 71
PROPOSED RULE
(53 FR 21550)

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GULF STATES UTILITIES COMPANY

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RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775

AREA CODE 504 435-6084 346-8681

OFFICE OF SECRETARY
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January 24, 1990
RBG- 32180
File No. G9.23.1

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Gentlemen:

Gulf States Utilities (GSU) is pleased to comment on the Commission's proposed rule concerning the Compatibility of Transportation Regulations with the IAEA (53FR21550 dated 6/17/88).

GSU concurs with the proposed rule regarding transportation regulations with the exception of the proposed requirement(s) for shipment of Low-Specific-Activity (LSA) material. The intended effect of this proposed rule is to increase the level of safety relating to transportation of radioactive materials. The proposed changes to the requirements for shipment of LSA material are not required to produce that intended effect specifically for transportation of radioactive waste within the continental United States. Presently, it is permissible to ship a radioactive Type B quantity in an NRC Certified Type A cask, however, under this specific proposal a Type B cask would be required for shipment. Due to the reduced availability of the required Type B casks in the United States, River Bend Station anticipates experiencing problems in obtaining these casks and shipping radioactive waste. Also, the additional labeling requirements for the shipment of LSA material are not necessary to ensure ALARA conditions.

GSU proposes that the issue of shipment of LSA material be reconsidered to not require the use of Type B casks for shipments within the continental United States, and to not require the additional labeling requirements.

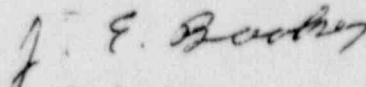
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GSU has also provided these comments to the Department of Transportation (DOT) on a parallel DOT proposed rule appearing in the Federal Register (54FR47454 dated 11/14/89). GSU appreciates the opportunity to comment on this proposed rule.

Sincerely,



J. E. Booker
Manager-River Bend Oversight
River Bend Nuclear Group

JEB/LAE/RGE/KCH/pg

