



**Consumers
Power
Company**

DOCKET NUMBER

PROPOSED RULE

PR-71
(45 FR 81058)

63

General Office: 212 West Michigan Avenue, Jackson, Michigan 48201 • (517) 788-0550

March 30, 1981

Secretary of the Commission
US Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

The following comments concerning the December 9, 1980 Federal Register notices for proposed rules on "Advance Notification to Governors Concerning Shipments of Irradiated Reactor Fuel" and "Advance Notification to States of Transportation of Certain Types of Nuclear Waste" are presented for your consideration:

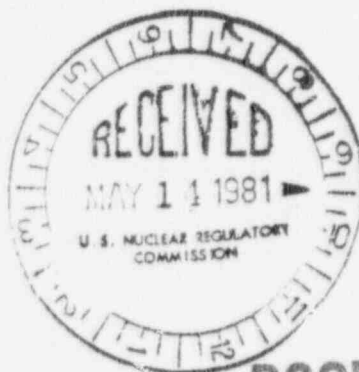
1. Consumers Power Company believes that the licensee should supply to the Governor of the appropriate State(s), the general information delineated in the proposed rules. However, once this information has been supplied, further information concerning shipments should be supplied by the carrier. There is no apparently good reason to require the licensee to track the route and schedule of the shipment of the material. This should be the responsibility of the carrier.
2. The motivation for safeguarding information regarding the details of the shipment routes and schedules is to prevent acts of sabotage or terrorism. For this reason, it seems counterproductive to disseminate details of the shipment routes and schedules to anyone in the state government who is not directly involved with the security of the shipment. Consumers Power Company suggests that all other state personnel be given only nonspecific information concerning shipments. This information might be limited to approximate schedules and assurances that the routes used would be those approved by NRC (for example, those in NUREG-0725).

Even though these comments are being submitted beyond the due date, please consider them in future actions concerning these proposed rules.

David P. Hoffman

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Nuclear Licensing Administrator

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