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January 28, 2000

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

Re: State of Nevada; Receipt of Petition for Rulemaking  
10 CFR 73, Docket No. PRM-73-10

The petition for rule making proposed by the Nuclear Regulatory Commission with regards to the issue of safeguards for shipments of spent nuclear fuel raised by the state of Nevada has been reviewed and discussed with members of our Nuclear Materials Transportation Work Group. This group was instrumental in putting together an emergency response plan to address nuclear transportation incidents in Nebraska, and specifically to prepare for shipments of high level waste.

We anticipate that the volume, frequency, and duration of nuclear material shipments, both foreign research reactor spent nuclear fuel and future high level waste shipments to Yucca mountain-when approved, will significantly increase.

Nebraska issues, which we believe will be supported by other corridor states, are primarily concerned with routing flexibility, escort or monitoring shipments, and the ability of state and local personnel to respond to incidents. In particular, more flexibility should be permitted for shipping routes so they are not so predictable, sufficient escort and/or monitoring should be provided, and adequate training/equipment should be available to state and local responders. Volunteer organizations typically lack the financial resources needed to train personnel or purchase equipment. Of greater importance, however, is the limited time these individuals have to attend training programs. Therefore, "tailored" training is needed for the local organizations, with additional training for the second level of emergency responders, typically state level resources.

It is the consensus of the State of Nebraska, that the issues identified by Nevada have merit and deserve further study by the federal government. Therefore, our recommendation is to support specific concerns addressing the security and physical integrity of these proposed nuclear material shipments and additional issues identified above.

If you should have any questions please feel free to contact the members of the Nuclear Materials Transportation Group identified below by Agency and area of expertise.

Major Bryan Tuma-Nebraska State Patrol (402-479-4950) for Security Issues  
Larry Pearce - Nebraska Energy Office (402-471-2867) for Planning & Legislation  
Jon Schwarz - Nebraska Emergency Management Agency (402-471-7410) for Training Capabilities, Coordination, and Equipment Needs

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Cheryl Rogers - Nebraska HHS Regulation and Licensure (402-471-6430) for Radiation Protection  
Technical Issues