

8/6/00

RSPA-99-6283-48



DEPT. OF TRANSPORTATION

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**Westinghouse  
Electric Company LLC**

Drawer 13  
Columbia, SC 29250  
(803) 647-3552

EH&S-NAK-00-024  
June 30, 2000

Dockets Management System  
U.S. Department of Transportation  
PL 401  
400 Seventh Street, SW  
Washington, D.C. 20590-0001

**SUBJECT:** Request for Comments on Advance Notice of Proposed Rulemaking, "Hazardous Materials Regulations; Compatibility With the Regulations of the International Atomic Energy Agency", 64 Fed. Reg. 72633 (December 28, 1999)

Westinghouse Electric Company hereby submits the attached response to Request for Comments Advance notice of proposed rulemaking, "Hazardous Materials Regulations; Compatibility With the Regulations of the International Atomic Energy Agency", Docket Number RSPA-99-6283.

Sincerely,

WESTINGHOUSE ELECTRIC COMPANY LLC

*Norman A. Kent*

Norman A. Kent  
Senior Engineer  
Nuclear Criticality Safety  
Nuclear Material Transport

Westinghouse is involved in Nuclear Energy Institute activities relating to the Advance Notice of Public Rulemaking. Please refer to NEI's comments dated June 29, 2000.

**1. Scope**

Westinghouse concurs with the NEI comment.

**2. Nuclide-Specific Thresholds**

Westinghouse concurs with the NEI comment.

**3. Communication Changes**

Westinghouse concurs with the NEI comment.

**4. Uranium Hexafluoride**

Westinghouse concurs with the NEI comment.

**5. Low Specific Activity (LSA) material and Surface Contaminated Objects (SCO)**

Westinghouse concurs with the NEI comment.

**6. Type B and Fissile Material Package Requirements**

ST-1 requirements for air transport of fissile material are unclear. Westinghouse concurs with the NEI comment, and refers to Westinghouse letter to USDOT, EH&S-NAK-00-021 dated May 31, 2000. This letter gives comments concerning the WNTI proposed change to ST-1, submittal #PC-17, "Transport of nuclear material by air."

**7. Other Changes**

Westinghouse concurs with the NEI comments.