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Rulemaking and Adjudication Staff United States Nuclear Regulatory Commission Washington, D. C. 20555

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Dear Sir or Madam:

I would like to make a few comments on Release of Solid Materials at Licensed Facilities.

Our earth, air, and water are all radioactive, naturally. People are exposed internally and externally every day to natural radioactive material which is ubiquitous in our environment. So called "background radiation" varies widely from place to place, with no discernable effect on human health.

It's common sense that we must consider man-made radioactive material according to how it compares to every day radiation exposure. Material should not be considered "radioactive" if it doesn't contribute significantly to the radiation exposure we already receive.

This approach balances two important national interests, namely, protecting the public and conserving our natural resources.

The best way this can be achieved is to adopt the consensus standard on "clearance" of material, American National Standards Institute (ANSI) Standard N13.12.

This standard ensures that the public is protected using the strict standard of "Negligible Individual Dose" as defined by the Congressionally Chartered National Council on Radiation Protection and Measurements. Adopting this standard will ensure public safety.

To some, it may seem desirable to reduce the theoretical risk of radiation exposure to zero. This thinking is both impractical and dangerous. Financial resources are finite. Real risks to real people cry out for their fair share of these resources. Spending too much of our finite resources to satisfy unrealistic fears of anything "nuclear" would simply be wrong.

Thank you for your consideration.

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