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To: TWFN_DO.twf2_po(NRCREP)
Date: Mon, Nov 8, 1999 11:09 AM
Subject: Draft Report Comments: Radiological Assessments for Clearance of Equipment and Materials from Nuclear

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Below is the result of your feedback form. It was submitted by Timothy V. Allsep (tallsep@framatech.com) on Monday, November 8, 1999 at 11:08:58

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 PROPOSED RULE PR 20
 (64FR35090)

Comments: I would first commend the Commission for its efforts to provide a uniform regulation for the release of solid material that would parallel what has been done with gases and liquids. I believe it is appropriate and beneficial to all involved actively or passively. The lack of uniform, cohesive regulations in respect to this issue is costly and confusing. I am concerned in respect to the participation noted at the Rockville mtgs. Few proponents of nuclear energy utilization were noted among those comprising the panel. The preponderance of participants were from special interest groups, each claiming to represent the public, but none of which has ever made contact with me or my family as a member of the public. I would note that one participant was rude, intimidating, disruptive and controlling to some degree during the entire proceeding. Thus, the meeting took a direction of issuing allegations, and acting in response to "public perception". To this end, we were!

encouraged by some participants to toss away science, the studies performed on the populations of Hiroshima, Nagasaki, Hanford, Los Alamos, and the Marshall Islands, all of which indicate there is not a increased risk associated with chronic exposures. As we sat receiving exposure from the granite of the building, swapping gamma photons from the potassium-40 in each of our bodies, I was saddened that the same individuals opposing this regulation, advocating the end of utilizing nuclear materials for any purpose, are the same individuals who would not allow the disposal of the material were we to stop all nuclear operations today. I believe we must do the right thing. We must educate the public in respect to the scientifically evaluated risk from nuclear material. We must invoke regulations, consistent with risk based upon scientific evidence, for the benefit of mankind. If one looks objectively at the data, the 10CFR20 limit of 100 mrem/yr to the public from licensed facilities is orders of magnitude less than any recorded clinically o

bservable biological effects. To implement a regulation more restrictive than this for non-operable facilities, etc. is to spurn science, restrict progress for all mankind, and impose undue social-economic burdens. The ALARA philosophy expressly states that exposures should be maintained in respect to socio-economic factors. The assumption of a linear relationship does not cite the slope of the curve (the risk) and is a de facto assumption. Thus, the attempt of some members to cite the LNT hypothesis to validate their public opinion theorem is a fallacy. If public opinion is to be the foundation for rule making on scientific issues, the world should still be flat, man should not fly, and human sacrifice to the sun god is still required.