

9

NRC FORM 659
(8-2000)



DOCKETED
USNRC

'00 SEP 27 AM 11:06

DOCKET NUMBER
PROPOSED RULE **PR 71**
(65FR44360)

OFFICE
ADDRESS

NRC PUBLIC MEETING FEEDBACK

Meeting Date: September 20, 2000

Meeting Title: Major Revision to 10 CFR Part 71

3100-0187

Expires: 08/30/2003

Public Protection Notification: If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

Please fold in half with Business Reply side out, tape the bottom, and mail back to the NRC.

Template = SECY-067

SECY-02

The NRC recognizes the public's interest in the proper regulation of nuclear activities and is committed to understanding and including public input into our decisions. The NRC seeks to elicit public involvement early in the regulatory process so that safety concerns that may affect a community can be resolved in a timely and practical manner. This process is considered vital to assuring the public that the NRC is making sound, balanced decisions about nuclear safety. If you would like more information about NRC, please visit our web site at www.nrc.gov.

1. Why did you attend this meeting?

- a. I am a local resident
- b. I work for an interested organization
- c. I am concerned about environmental issues
- d. I am concerned about economic issues
- e. Other Concerned for health + safety

2. Were you familiar with the meeting topic prior to coming today?

- a. Very
- b. Somewhat
- c. Not at all

3. How did you find out about this meeting?

- a. NRC mailing list
- b. Newspaper
- c. Radio/TV
- d. Internet
- e. Other mailing from Coalition of groups including WAND of which I am a member

4. Have you attended an NRC meeting before?

- a. Never
- b. 1 or 2 times (Have attended 1 DOE hearing)
- c. 3 to 5 times
- d. More than 5 times

5. Was sufficient notice given in advance of the meeting?

a. Yes

b. No

6. How well do you feel you understand the NRC's role with regard to the issues discussed today?

a. Very well

b. Somewhat - *better after this meeting*

c. Not at all

7. Were you able to find all of the supporting information you wanted prior to the meeting?

a. Yes

b. I did not try to find any information

c. No *material from workshop on nuclear transportation is still packed (I moved this summer)*

8. Was the purpose of the meeting made clear in the preliminary information you received?

a. Yes

b. No

9. In your opinion, were people's questions answered clearly, completely and candidly?

a. Yes *Some were*

b. No

10. Was the written material useful in understanding the topic?

a. Very

b. Somewhat - *very little - some was too technical for me*

c. Not at all

11. Were NRC's presentations and material presented in clear, understandable language?

a. Yes - *mostly*

b. No - *sometimes*

12. In your opinion, did the meeting achieve its stated purpose?

- a. Yes *Somewhat*
 b. No

13. Has this meeting helped you with your understanding of the topic?

- a. Greatly
 b. Somewhat
 c. Not at all

14. How well did NRC staff respond to your concerns at this meeting?

- most* a. My concerns were directly addressed
 b. I was provided an alternate source of information to address my concerns
 c. I did not raise my concerns at this meeting
 d. I raised my concerns but am not satisfied with the response *a couple*

15. Was adequate time allotted for discussion with NRC staff on the topic of today's meeting?

- a. Yes
 b. No

16. How satisfied are you overall with the NRC staff who participated in the meeting?

- a. Very
 b. Somewhat
 c. Not at all

17. Were the next steps in this process clearly explained, including how you can continue to be involved?

- a. Yes
 b. No *+ while I was present (8-10:15 P.M.)*

If you would like someone to contact you, please provide your name and phone number or email.

Name Lois M. Congdon
1438 Church St. Apt. 703, Decatur, GA 30030
Telephone 404-378-2596 E-Mail _____

NRC is striving to improve its communications with the public and would appreciate any additional comments you may have on today's meeting:

I appreciated explanations such as on dose regulations, which were somewhat reassuring to me that you are trying hard to protect our health and safety. May God guide and empower you to do this.

Thank you for a late evening meeting which those of us who work 9-5 could attend.

COMMENTS ON NUCLEAR REGULATORY COMMISSION ISSUES

I agree with the proposal on Issue #14 to incorporate the Code of the American Society of Mechanical Engineers. This might avoid the problem of putting radioactive materials into a cask with a crack in it as was done at least once. The containment systems need to be inspected and certified before they are used to hold radioactive materials.

General Comment on the whole process of conforming our regulations and standards to those of the International Atomic Energy Agency: If any I.A.E.A. regulations are more stringent than the ones we presently have (and I do not know of any that are), then improve our regulations in line with theirs. However, most of the regulations and standards that I have been informed about are less stringent than our present national ones. **WE SHOULD NOT LOWER OUR STANDARDS TO CONFORM TO THE I.A.E.A.** The I.A.E.A. ones should be considered an international minimum standard, and nations should be allowed to make their national requirements more stringent to protect the lives and health of their citizens. Concern for the safety of people and the environment should be primary. Cost should only be taken into consideration if the proposed change does not decrease the safety of the populace.

Issues 1 and 17: I oppose increasing the amount of radiation allowed to be released before regulation takes place, lowering the requirements for nuclear container testing, lowering the assessed impact of radiation on the body, and dropping special requirements, such as double walls for plutonium containers. **THERE SHOULD BE DOUBLE WALLS FOR ALL CONTAINERS OF RADIOACTIVE MATERIALS.** From the time of the Manhattan project to develop an atomic bomb to the present government agencies have underestimated the amount of radiation that is harmful to humans and animals. This was acknowledged when our government belatedly agreed to compensate armed services personnel whose health was adversely affected by witnessing nuclear tests in the 1940's. A couple years ago the National Institute of Health finally obtained formerly classified information about the levels of radiation from atmospheric testing in various parts of our country. There was a strong correlation of the amounts of radiation with the number of cancer cases in the various areas. I strongly suspect that the increase in bone cancer cases I have seen over the years in my friends is related to their having drunk milk containing strontium 90 during their childhood. Radioactivity damages cells, and some damaged cells become cancerous, although it takes years for the cancer to appear usually. **WE MUST DO EVERYTHING POSSIBLE TO MINIMIZE EXPOSURE TO RADIOACTIVITY** above that which occurs naturally.

I oppose having only the International System of Units labels on packages. The English system should also be used, because the lower numbers of the S.I. labels deceptively make it look as though the radiation is decreased when it is actually increased.

I DEFINITELY STRONGLY OPPOSE ISSUE 2, RAISING THE LEVEL OF RADIOACTIVITY CONSIDERED LOW ENOUGH THAT IT DOES NOT HAVE TO BE LABELED OR REGULATED AS A NUCLEAR MATERIALS SHIPMENT. The Environmental Protection Agency acknowledges in its Safe Drinking Water Standards that there is no safe dose of ionizing radiation. As people are exposed to several small doses of radiation from different sources it has a cumulative, health-threatening effect.

Issue 4: I oppose exceptions to the requirements for containers of uranium hexafluoride. All shipments should meet all three tests: internal pressure test, drop test and thermal test.

Issue 5: Do NOT decrease separation distance requirements which are necessary to avoid any chance of a criticality occurring.

Issues 6 and 11: I am glad to see raising the fire test requirement from 30 minutes to an hour, but 2 hours would be more realistic in the case of an airplane crash in hard to reach areas. Continue not to allow the transport of plutonium by air. I would prefer not having any radioactive materials being transported in the planes that fly over my head every day!

Issue 7: I oppose the change to a "no rupture" criterium instead of the former criteria of no collapse, buckling or leakage. However the one hour in the water without leakage rule is absolutely unrealistic. If a ship were sunk that contained nuclear material, it would be underwater for many hours and probably days before the material could be retrieved. Look how long it took rescuers to get to the Russian submarine!

Issue 8: I oppose this and prefer the 1967 edition of SS #6 that requires old packages to be recertified, removed from service or shipped via exemption, although I am hesitant to approve any exemptions.

Issue 10: I oppose any reduction in the types of tests performed.

Issue 15: I strongly oppose allowing certificate holders to make changes in spent fuel storage cask designs without prior N.R.C. review and approval.

Issue 18: Contamination levels should not be decreased for larger packages handled by crane, because over time the levels built up on the cranes would become excessive. Surely robots could be devised to get close enough to measure the contamination level. If the contamination levels are too high for workers to get close enough to measure them, then they are too high to be shipped anywhere, exposing many people to the radiation.

Procedural concerns: Proposed changes should be published on a web site available to the public, not kept in expensive copyrighted documents. There should be a longer period for public comments across the nation, not just in ^{three} ~~two~~ cities.

WHENEVER YOU PROPOSE CHANGES IN REGULATIONS, ASK YOURSELVES, "WOULD I WANT MY CHILD TO BE THE PILOT OF THE PLANE, THE CAPTAIN OF THE SHIP, ENGINEER OF THE TRAIN OR WORKER IN THE NUCLEAR PLANT OR IN THE TRANSPORTATION OF THIS MATERIAL OR LIVING BESIDE THE TRAIN TRACKS OR HIGHWAY ON WHICH THIS IS TRANSPORTED?"

Strive for the least transportation of nuclear materials possible; for instance, do not try to get a storage place in the middle of the country, such as Nevada, requiring large amounts of nuclear materials to be transported large distances. Discard all ideas of using Mox fuel, which would make more radioactive waste than it uses up. Consider deep sea storage of nuclear materials and non-nuclear, non-polluting sources of energy such as the sun, wind, water and geothermal.

Dr. Lois M. Congdon
1438 Church St., Apt. 703
Decatur, GA. 30030-1571

