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**Statement of Public Citizen's Critical Mass Energy & Environment Program
On The
U.S. Nuclear Regulatory Commission's Major Revision to 10 CFR Part 71
Compatibility with ST-1 – the IAEA Transportation Safety Standards**

August 10, 2000

Good Morning, my name is James Riccio. I'm the Senior Analyst with Public Citizen's Critical Mass Energy and Environment Program. I appreciate the opportunity to present our views on the Nuclear Regulatory Commission's (NRC) consideration of a rulemaking that would revise both the U.S. Department of Transportation and the Commission's regulations on packaging and transporting radioactive material to make it compatible with the International Atomic Energy Agency (IAEA) transportation safety standards.

Public Citizen is familiar with the harmonization of domestic and international standards through our work on the North American Free Trade Agreement, the Global Agreement on Tariffs and Trade and most recently the World Trade Organization meeting in Seattle. Public Citizen is a founding member in the Trans Atlantic Consumer Dialogue that seeks to ensure that harmonization lifts all nations to higher standards of public health, worker safety, environmental and consumer protection. Toward this end, the Dialogue established principles for the harmonization of international and domestic standards that should similarly apply to NRC's revision of 10 CFR Part 71:

- The harmonization of NRC regulations with the IAEA standards should in no way reduce the level of protection currently afforded American citizens.
- Harmonization of NRC safety standards with those of the IAEA must result in the adoption of the best available technology and embody the highest levels of consumer and environmental protection.
- International standards should be viewed as a floor rather than a ceiling. The IAEA standards should establish the minimum acceptable standards and should not act to prohibit establishment of more conservative domestic standards.
- The NRC should only recognize and be involved harmonization activities that are negotiated in open, accountable and democratic forums.

Public Citizen appreciates the opportunity to present our views and will more thoroughly address the specific issues raised by NRC's issue paper in our formal comments this September.

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Ralph Nader, Founder

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