

DOCKET NUMBER  
PETITION RULE PRM 30-64  
(65 FR 49207)

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October 25, 2000

Secretary  
U.S. nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Re: Docket No. PRM-30-64

Dear Sir/Madam

I am the original petitioner of PRM-30-64.  
I have been checking the NRC's rulemaking website where this petition is posted for comments for the past 75 days since it was made available for comment.  
Since this is the last official day for comments to be received, I would like to make the following comment.

1. In my original petition to the NRC I stated that there is a serious failure by the regulatory process to "getting the word out" to the affected parties. One comment was received over the past 75 days and that was from the presidents of the American College of Nuclear Physicians and the Society of Nuclear Medicine. Organizations such as these have designated individuals that are responsible to review the Federal Register for rulemakings that might affect their members. Out of the 12,000 members they stated that they represent, how many really are aware of the existence of this petition?

I would venture a guess that no more than 1% of all the radioactive licensees in the United States have been made aware of this petition either by reading the Federal Register, viewing your website, or by word of mouth.

I am constantly barraged by marketing people that e-mail unsolicited messages on a daily basis.  
How come the regulatory agencies cannot do the same?  
I would guess that most licensees have email addresses and would welcome notifications that regulatory changes are afoot that might dramatically effect the way they do business.

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1. I would like to respond to the comment submitted by Drs. Podoloff and Links.

The Petitioner did not have ample opportunity to comment at the time of promulgation.

The agreement state of Texas did not solicit comments from its licensees nor do I believe the state agency submitted any comments of their own to the NRC at the time the rules were being promulgated.

I can only assume the other agreement states that represent the other 75% of the radioactive licensees did the same.

Our license came up for renewal in 1997, years after the NRC's rules took effect.

As for your objection to the portion of my petition requesting that every licensee be required to come under the financial assurance, I did not mean to include licensees with only short-lived radioactive material (less than 120 day half life) on their licenses. Common sense tells us that licensees with short-lived radionuclides will not have any long term liability such as a licensee with long-lived material would have.

I must take exception to your comment that nuclear nuclear medicine licensees should not be burdened with the same financial assurance and record keeping requirements that other licensees are, because they provide a "public benefit".  
Newsflash! Industry provides a "public benefit" also. Contrary to popular belief, we do not have unlimited funds.

Sincerely,

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