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GRACE

GLOBAL RESOURCE ACTION CENTER FOR THE ENVIRONMENT

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June 24, 2002 (10:38AM)

Helaine Lerner
Board Chair

TO: Secretary, US Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemaking and Adjudications Staff

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Alice Slater
President

RE: Comment on NRC proposed rule 67 Federal Register 83:21390-21484,
4/30/2002

Project Directors

David Brubaker
William J. Weida

The Global Resource Action Center for the Environment strongly opposes the proposed changes to domestic United States radioactive-transport regulations on the grounds that the looser regulations will unnecessarily endanger the health of many Americans and their local environments by increasing accident probabilities and widening the range of sites subject to terrorist attack.

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Your proposals to legalize the exemption of varying amounts of radionuclides from transportation regulatory control, allow greater contamination on surfaces of irradiated fuel and high level radioactive waste containers, and removing the United States' requirement that plutonium be shipped in double-shelled containers are unnecessary concessions. If radioactive materials must be shipped throughout our country, then their means of transport must at least meet the current safety precautions, if not more stringent guidelines.

The idea of "Harmonization" or international conformity is really a poor excuse for accepting the nuclear power industry's desires to weaken nuclear transport regulations, especially since United States has consistently opposed nuclear deregulation in other countries.

Tens of thousands of shipments of irradiated nuclear fuel will be moving across this country and around its coastlines if the Yucca Mountain Project proceeds. They are dangerous enough with average contemporary accident rates what they are, without further endangering our country's health by increased deregulation.

On behalf of the people of this country, we urge you not to accept these revised and diminished regulations.

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