

Georgia Department of Natural Resources

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Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attention: Rulemakings and Adjudications Staff

Dear Sirs:

I am the specialist for transportation matters for the State of Georgia's Radioactive Materials Program, and I would like to submit the following comments (TS-R-1 and STP-02-033):

- (1) We see no hazards to health or safety with any of the proposed changes.
- (2) Changes should not be made without a cost analysis, especially when the changes are made only to simplify international shipments - not all Georgia licensees and citizens do business overseas, but all may be affected by such changes.
- (3) We agree with NRC's decision to keep dual units in labeling.
- (4) It is critical to ensure that NRC and DOT requirements and definitions are identical.
- (5) We agree with public comments that the lowering of some exemption values will increase costs without increasing safety, as evidenced by the exemplary history of transportation in this country (see NORM discussions), so therefore should not be done.
- (6) We agree with NRC's decision to keep A1A2 values as is for molybdenum 99 and californium 252.
- (7) We agree with public comments about "grandfathering" and packaging: usage periods should be extended long enough to ensure that the "money's worth" is obtained. Changes should not be mandated when no harm or hazard has been demonstrated.

Sincerely,

Lauren A. Palmer
Principal Environmental Radiation Specialist
Radioactive Materials Program

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