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It seems that the new process for the development of our radioactive transportation standards is not democratic. This is of great concern to me, particularly in light of the enormous increases in nuclear waste transportation shipments that are likely to happen. It is very likely that nuclear waste transportation will be affecting thousands of **ADDITIONAL** communities in the next few years. Two proposed nuclear waste transportation routes (one rail and one highway) each lie within about 5 blocks of my house\*. Considering the thousands of other communities that lie directly along future nuclear waste transportation routes, the Nuclear Regulatory Commission and the Department of Energy each need to keep in mind the incredible responsibility that they have to the public. Documents must be accessible to the public. Deliberations and negotiations need to be made known.

The International Atomic Energy Agency developed these recommendations without general public knowledge or input. The regulations were then transferred to other UN agencies that have agreements and routines already set up for accepting IAEA's rules for the sake of international regulatory 'harmony'. In my opinion, it would be abhorrent if we were to allow a weakening of radioactive transport standards based strictly on 'harmonization' (international conformity), without looking closely at the actual proposal.

I understand that much of the data that has been used is outdated, and that there is a serious problem with lack of data on certain issues. Apparently there are over 350 radionuclides for which we do not have any calculations for at all. This is completely unacceptable.

One thing in particular that is extremely absurd is the proposed removal of the US requirement that plutonium be shipped in double-shelled containers. I am flabbergasted that this would even be proposed.

At a time such as this, looking at the truly enormous increase in nuclear waste transportation that would be occurring if either the Yucca Mountain or Skull Valley project were to go forward, we really need to be strengthening our standards. There are millions of people, thousands of schools, and hundreds of hospitals residing directly along transportation routes.

Thank You,

Eileen Greene  
1375 South 1000 West  
Salt Lake City, UT 84104  
801-972-3832  
visualizations3@sisna.com

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