

ST. LOUIS COUNTY MUNICIPAL LEAGUE

DOCKET NUMBER
PROPOSED RULE PR 71
(67FR 21390)

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REGULATORY SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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Executive Board: July 29, 2002

President
Gerry Welch
Mayor
City of Webster Groves

Secretary
Nuclear Regulatory Commission
Fax: 301-415-1101

Vice President
E. William Bergfeld Jr.
Mayor
City of Warson Woods

ATTN: Rulemaking and Adjudications Staff
Re: 10CFR 71 67FR 21390-21484 4/30/02
RIN 3150-AG71

Finance Chairman
John Schuster
Mayor
City of Glendale

I am writing in regards to the above referenced regulations.

Benjamin T. Allen
Councilman
City of Black Jack

Recently, the effort to ship nuclear waste to the Yucca Mountain site was approved. At this time, we do not oppose that plan to centralize nuclear waste. But it will undoubtedly result in a great deal of shipments of dangerous materials. In addition, the use of radioactive materials appears to be increasing in our advancing society, which results in more frequent shipments of other radioactive materials.

Virginia Bira
Mayor
City of Vinita Park

When combined with the potential threats of terrorist activity, and apparent declines in both rail and highway and, perhaps, waterway and airway infrastructure, it is important that the standards for shipping hazardous materials are strengthened. The proposed regulations would do the opposite. Casks carrying radioactive material would be reduced from double sided to single sided design, increasing the chances of radioactive contamination. Metropolitan areas, where obvious concentrations of the people exist, would be particularly threatened by accidents under current regulations. Weakening the containers would only increase risks already likely to increase from increasing volumes alone.

T. R. Carr
Mayor
City of Hazelwood

Bert Gates
Mayor
City of Shrewsbury

Betty Humphrey
Mayor
City of Richmond Heights

Richard LaBore
Alderman
City of Crestwood

Annette Kolis Mandel
Mayor
City of Creve Coeur

Richard "Skip" Mange
Councilman
St. Louis County

John Nations
Mayor
City of Chesterfield

Thomas Wolf
Councilman
City of Ferguson

Reducing the numbers and types of material subject to shipping regulations is also a step backward. While commercial, medical, utility generation and other advances should be free of unnecessary regulation to aid citizens, reasonable regulation must continue. It is inconsistent to threaten the population by actions to relax controls over these potentially hazardous substances that exist to promote advances in the first place. We can advance our civilization without threatening it at the same time.

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SECY-02

World standards do make sense at times, but not every time. The standards in the United States should not, perhaps under the ruse of international harmony, be diluted unnecessarily. The adoption of any weakened regulations governing these hazardous materials should be delayed, particularly in light of the events of September 11, until more study has been completed and public input sought, especially when such policies are driven by international bodies, however well-intentioned, that may not recognize the strong safety standards, knowing the cost benefit tradeoffs, expected by the citizens in the United States.

Sincerely,

A handwritten signature in black ink that reads "Gerry Welch". The signature is written in a cursive, flowing style.

Gerry Welch, President
CC: Board of Directors