

August 10, 2002

August 21, 2002 (3:55PM)

Secretary  
U.S. Nuclear Regulatory Commission  
ATTN: Rulemakings and Adjudications Staff  
Washington, DC 20555-0001

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**PR-71**  
**(67FR21390)**

U.S. Department of Transportation  
ATTN: Dockets Unit  
Docket No. RSPA-99-6283 (HM-230)  
400 Seventh St., SW, Room PL 401  
Washington, DC 20590-0001

SUBJECT: Comments on NRC and DOT Proposed Rules 67 FR 21389 and 67 FR 21327 that were published on April 30, 2002

Dear Sirs:

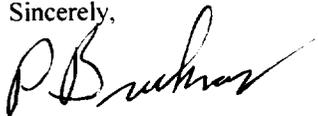
I support both agencies efforts to revise and update their transportation regulations to achieve greater consistency with the current international standard TS-R-1, 1996, and to make other changes the agencies' believe are necessary.

1. I have one specific suggestion for consideration by both the NRC and DOT in developing their respective final rules. Both the NRC's regulations in 10 CFR Part 71, Appendix A, Tables A-1 and A-2, and DOT's regulations in 49 CFR 173.435 and 173.436 contain tables that list the A<sub>1</sub>, A<sub>2</sub>, and exemption values for various radionuclides. The information is currently sorted alphabetically by the nuclide symbol (e.g., Ag, Al, Ar). However, as an alternative, I would suggest instead the information provided in these tables be sorted alphabetically by the nuclide name (e.g., Aluminum, Argon, Silver).

Individuals who use these regulations frequently — and more importantly those individuals who only use these regulations infrequently — are typically more familiar with the spelling of the name of a nuclide, rather than the spelling of the symbol of a nuclide. Therefore, this change would provide for easier use by all individuals who utilize these regulations. Additionally, I believe that sorting the information by nuclide name would achieve greater consistency with the June 1, 1998, Presidential Memorandum on "Plain Language in Government Writing." I acknowledge that while TS-R-1, Section 401, Table 1, is sorted by alphabetically by nuclide symbol, sorting the NRC's and DOT's regulations alphabetically by nuclide name would be technically consistent with TS-R-1, though not identical; however, as noted by Ralph Waldo Emerson, "A foolish consistency is the hobgoblin of small minds...."

While this comment was not submitted before the close of the comment period, I believe that it is practical for both agencies to consider this comment and incorporate its changes into their respective final rules.

Sincerely,



P. Brochman  
Olney, Maryland