

From: James Salsman <james@bovik.org>
 To: <SECY@nrc.gov>
 Date: Thu, Jun 30, 2005 7:21 PM
 Subject: Re: PRM-20-26 Comment

DOCKET NUMBER

PETITION FILE PRM 20-26
 (70 FR 34699)

Secretary
 U.S. Nuclear Regulatory Commission

DOCKETED
 USNRC

Dear Secretary:

July 1, 2005 (9:31am)

Thank you for this opportunity to respond to the comments of Fred Adams dated 15 June 2005 on my petition PRM-20-26. Mr. Adams asked that annual limits on intake (ALIs) and Derived Air Concentrations (DACs), which are used to determine acceptable limits of radionuclide inhalation based on radiological risk only, not be modified to also include risk from chemical toxicity, because the tables are sometimes used for dose estimation purposes, and Mr. Adams thinks that including chemical toxicity risk may cause confusion.

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

The United States Code, at Title 42, Section 2114, states that, "The Commission shall ... protect the public health and safety and the environment from radiological and non-radiological hazards...."

I know of no situations where any health professional should estimate radiological risk from radionuclide inhalation without also estimating its risk from chemical toxicity. This is particularly important when, as in Uranium-238, the chemical toxicity risk is far greater. I would ask Mr. Adams if he knows of any such situations.

Sincerely,
 James Salsman

CC: <Fred.Adams@DOH.WA.GOV>, <fredandkath@charter.net>

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