

## DOCKET NUMBER

PETITION FILE PRM 20-26

(70 FR 34699)

From: James Salsman <james@bovik.org>  
To: <SECY@nrc.gov>  
Date: Sat, Jul 2, 2005 7:30 AM  
Subject: Re: PRM-20-26 Comment

DOCKETED  
USNRC

July 5, 2005 (10:08am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Secretary  
U.S. Nuclear Regulatory Commission

Dear Secretary:

Fred Adams, in his second response to petition PRM-20-26 and my comments on his earlier response, did not specify a situation where any health professional should ever consider the radiological toxicity of uranium inhalation without also and simultaneously considering its non-radiological toxicity.

Mr. Adams wrote, "the chemical toxicity of uranium is adequately addressed elsewhere in the federal regulations." On the contrary, the only chemical toxicity of uranium considered by the current regulations is nephrotoxicity, without any consideration of the developmental or reproductive toxicity of uranium. This is a terrible situation for health regulators to be in, because uranium is a very powerful developmental and reproductive toxin.

I am unable to find any evidence that updating the exposure limits to reflect the chemical toxicity of radioisotopes will, "remove a useful tool for dose estimation from the hands of the radiation health physicists, who are typically responsible for the observance of radiation exposure limits," as Mr. Adams wrote. In addition to the earlier tables being easily available, providing exposure limits for radiological and non-radiological hazards of the chemically toxic radioisotopes will make complicity with all regulations much easier. Anyone who needs access to risk levels for an isotope's radiological hazard alone is able to obtain back-issues of the earlier regulations involved on the internet and from the Government Printing Office, if indeed anyone ever wants to.

Sincerely,  
James Salsman

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SECY-02

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