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Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Requirements

Comment On: NRC-2016-0179-0005

Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Standards; Notice of Issues Paper, Public Meeting, and Request for Comment

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General Comment

1. Any changes to the U.S. Nuclear Regulatory Commission's (NRC) and U.S. Department of Transportation's (DOT) regulations, to "harmonize" them (make them compatible) with International Atomic Energy Agency (IAEA) regulations and standards, should be in the direction of better protecting worker and public health, safety, and the environment ("better" in the clear sense of protecting people and the planet, not in the Nukespeak sense of saving the industry money in order to boost its profits!). That is, if IAEA's regulations and standards are stronger (allowing less exposure to hazardous ionizing radioactivity, to people and other living things), those should become NRC's/DOT's. But if NRC's/DOT's happen to be stronger, then those should remain -- and NRC/DOT should urge IAEA to strengthen its standards. In fact, if there are regulations in a certain country that are stronger/better than IAEA's and/or NRC's/DOT's, then those best-practices should be used to strengthen IAEA's and/or NRC's/DOT's regulations. The point is, the regulations -- at NRC/DOT in the U.S., at IAEA internationally, etc. -- should be strengthened to the highest standards and best-practices, not weakened to the lowest common denominator.