

DOCKET NUMBER
PETITION RULE PRM-40-24
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USNRC

UNION CARBIDE CORPORATION OLD RIDGEBURY ROAD, DANBURY, CT. 06817
LAW DEPARTMENT

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September 29, 1982

Mr. Samuel Chilk
Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Attention: Chief, Docketing and Service Branch

Dear Mr. Chilk:

Enclosed please find a petition for rule making on behalf of Union Carbide Corporation. This petition requests the U.S. Nuclear Regulatory Commission ("NRC") to reconsider and revise Criteria 1, 5, 6 and 10 of Appendix A to 10 C.F.R. Part 40, regulations relating to uranium milling operations and the disposition of tailings or waste resulting from such activities, promulgated by the NRC on October 3, 1980.

Union Carbide Corporation is firmly committed to addressing health and safety risks associated with uranium milling and mill tailings. However, it is the Corporation's opinion that the risks to the public that formed the basis for the 1980 regulations have been overestimated and that the costs of implementation have been underestimated. This opinion is apparently shared by the House Appropriations Committee. That Committee recently adopted the report of its Subcommittee on Energy and Water Appropriations on the 1983 Energy and Water Development Appropriation Bill. The report, H. R. 97-850, filed September 21, 1982, states:

"Internal NRC correspondence recently available to the Committee also indicates that the Commission's standards were not supportable based on a technical evaluation of the health risks involved, nor benefit-to-cost criteria. Rather the standards were set judgmentally based on a perceived need 'to do something.'

add. John Philips
4000 MWBB
W.O.H. 1130 SS

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