

DOCKET NUMBER  
PROPOSED RULE PR 19, 20, 21 et al.  
(59 FR 6792)

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124 Chestnut St., #210  
Englewood, OH 45322  
June 14, 1994

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Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attn. Docketing and Service Branch

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear Secretary:

Since an extension to June 15, 1994 of the Comment Period for the Certification of Gaseous Diffusion Plants by the Nuclear Regulatory Commission (Proposed Rule, Federal Register/Vol. 59, No. 29/Friday, February 11, 1994) has been granted, I herewith submit my comments about the Proposed Rule:

1. The Integrated Safety Analysis (ISA) of the facility and processes should be conducted by an outside agency in addition to the licensee to verify reports and tests, otherwise the licensee could act in self-interest;
2. An allowable radiation dose of .25 Sv (25 rems) to an individual at the site boundary is much in excess of the 500 mrem recommended threshold limit per year for "radiation workers" and the general public. (See Jurgen Kiefer, Biological Radiation Effects, 1990, p. 368.).

Not only do these high levels apply for normal operation conditions but they are also allowed for the storage, transfer, and disposal of by-products and special nuclear materials.

Permitting the Corporation to exceed the 500 mrem limit by fifty times is inexcusable and demonstrates no real desire to protect individual workers or the general public;

3. Giving the Commission the option or the decision about removal of data to the Restricted Data Classification allows the privilege of withholding from the public data which may affect their very lives. This is intolerable and does not comply with current transparency efforts; and
4. Giving the Director alone the discretion to allow a public meeting, even with an appropriate application from the public, is an unfair limiting procedure. Designing a process for consultation with the EPA or state officials and a community representative, would more equitably decide and prepare for scheduling a public meeting.

I believe that the above four statements weigh overwhelmingly for denying the Proposed Rule as written, or, at the very least, toward a strategy for reworking the entire Rule for Certification of the Gaseous Diffusion Plants.

Sincerely,

*Velma M. Shearer*

Rev. Dr. Velma M. Shearer, Staff Minister  
NEIGHBORS IN NEED

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