

Stuart Smiley
112 Sterling Court
Alpharetta, GA 30201
September 19, 1990

Mr. J. Philip Stohr
U.S. Nuclear Regulatory Commission
101 Marietta Street Suite 2900
Atlanta, GA 30323

Subject: Written Statement for Atlanta BRC Public Meeting

Attention Mr. J. Philip Stohr:

I would like to protest the fact that the Atlanta BRC Public Meeting is being held during the day when most people, like myself, have to work and are unable to attend.

I would also like to protest the fact that the BRC Policy Statement was developed without public input.

I realize that by adopting the BRC policy my personal risk only amounts to a 0.25% increase in my lifetime risk of a cancer death, according to the NRC BRC Policy Statement Appendix-Dose and Health Effects Estimation. I also realize that by adopting the BRC policy the savings to the nuclear industry could be up to 100 million per year according to industry groups. That represents approximately 0.00007% of my \$25,000 annual salary for my family of four.

I believe that for such an insignificant savings, the potential risks of the BRC policy far outweigh any potential benefits for the following reasons:

1. By allowing up to 30% of the existing low level radioactive waste stream to fall Below Regulatory Concern, the doors will open wide for careless or unscrupulous operators to divert radioactive materials far exceeding the limits set by BRC into the municipal solid waste stream.
2. It does not appear that the NRC takes their responsibility to protect public health and safety seriously based on the fact that the BRC policy statement devotes 22 pages to justifying the policy and less than one half of a page to "Quality Assurance and Reporting".
3. There is no indication that the NRC will be able to effectively assure that the BRC policy is not abused.
4. It will not be feasible for the NRC to study the long term health effects of the BRC policy because BRC slightly radioactive material will be difficult to track once it becomes exempt. If any unforeseen health effects were caused by the policy, they would most likely be far into the future and so far removed from the source of radiation as to be untraceable.

Therefore, based on the relatively insignificant benefit of a BRC policy to the public, the potential and unforeseeable risks far outweigh the benefits. I am vehemently opposed to any regulatory exemptions of any kind for any type of slightly radioactive materials, particularly the BRC policy.

Respectfully,

Stuart Alan Smiley
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