

DS0910 APP: Richard Cunningham

ECOLOGY/ALERT

BOX 621

BLOOMSBURG 17815

E Nemethy, Sec'y

Jan 4 -87

Re: Materials Safety Regulations

Fed Reg - Dec 17-86, p 45122

NRC

Rules & Procedures Branch

Div of Rules & Records

Wash DC 20555

12/17/86  
SIFR 45122

86-1

Gentlemen =

The NRC is to be commended for contracting this study of materials safety regulations.

The men who produced the report have pulled no punches, unearthed some existing conditions that demand correction, and have come up with 22 notable ideas on how to correct them.

Their report, on the whole, is written in clear language. (Though we did take issue with the needlessly prissy phrase "regulatory implementation gap", which is repeated throughout. Why not just say "regulatory lack" or "omission"?)

We have some comments on the following recommendations:

#1 - Since NRC, directly or indirectly, is the creator of the medical and industrial uses of radionuclide by-products, we feel NRC should be responsible for regulating all hazardous materials used in these processes.

Otherwise, there could be a cat's cradle of conflicting or overlapping authority at such facilities. This might produce complete confusion, or stalemates - in which nobody claims responsibility.

#2 - The study suggests the threshold for "soluble uranium exposure" be lowered from 2 mg. Based on some of NRC's other exposure guidelines, we feel it should probably be lowered to .2 mg or even .02 mg.

#3 - Re: devices used in gauges to measure level, thickness and density: Aren't there effective non-radioactive ways to do these jobs? Possibly with lasers? If so, why not phase out this group of devices?

The "limiting criteria" for accidental exposures - 200 rem to the extremities, 50 rem to body organs - are not only high, but pose an unconscionable risk to workers or anyone exposed to these gadgets.

#7 - We must take exception to the proposal that NRC require remaining states to join the Agreement States Program. In PA, this would probably rest with the Dept of Environmental Resources, whose performance has not been so hot. We don't think they're ready for this.

#19 - This recommendation indirectly points up a major flaw in NRC regulations - and other communications: "...a licensee may unwittingly fail to comply with a requirement because the licensee did not interpret it the same way NRC did."

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MISC SIFR 45122 PDR

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Ecology/Alert

An old maxim says: "Don't explain something so your hearer will simply understand it. Explain so he can't possibly misunderstand."

Your writers are so addicted to pompous jargon - in endless sentences lacking commas - it often takes 2 or 3 readings to get the gist.

Get rid o' them syllables!

Better yet, hire a couple of WRITERS (preferably ex-newsmen) to draft your stuff!

C. Newman

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