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PROPOSED RULE PR 50
(64FR31737)

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USNRC

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Center Affiliated Scholar
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September 16, 1999

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Mail Stop O-16 C1
Washington, DC 20555-0001

ATTENTION: Rulemakings and Adjudications Staff

SUBJECT: Proposed Rule: Consideration of Potassium Iodide in
Emergency Plans (64 Fed. Reg. 3173-June 17, 1999)
Request for Comments

To the Commissioners:

I realize that the deadline noted in the Federal Register has passed, but I wish to submit comments for your consideration, and I hope they can be included despite the late date.

After the extensive public debate on the matter of requiring potassium iodide (KI) to be stored for distribution near each nuclear plant, I am deeply disappointed that this issue has again been raised.

I will be blunt: There is no justification for this proposed rule. There is no public health or safety justification. After all the safety requirements that the licensing basis calls for, one could not find a probabilistic risk that calls for stored KI at an NRC licensed nuclear power plant.

The only people or organizations which have called for such a rule are opponents of nuclear power. They have shown no interest in public health nor any recognition of the safety requirements and risk assessments that are part of the record for every plant. The reason for this proposal is to build even more distrust and skepticism for nuclear power among the American people.

The Commission should never have certified such a proposed rule for public comment.

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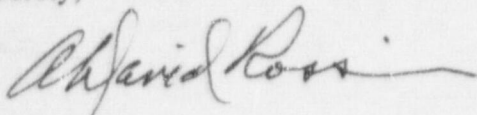
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The Commission has made public statements about its progress in use of probabilistic risk assessment in its regulatory process. Failure to weed out this obviously politicized proposal when it was raised by the staff makes a mockery of the Commission's initiatives. Even the publicity surrounding public comment, let alone a public hearing would accomplish the objectives of the people who submitted this proposal.

I urge the Commission to act responsibly with regard to this proposed rule and reject it. The reasons for its rejection are obvious and should be clearly stated so that the public and Congress can understand them.

Sincerely,

A handwritten signature in cursive script that reads "A. David Rossin". The signature is written in dark ink and is positioned below the word "Sincerely,".

A. David Rossin

For identification:

I was Assistant Secretary for Nuclear Energy, U.S.D.O.E. 1986-87, Director of the Nuclear Safety Analysis Center at EPRI 1981-86, and President of the American Nuclear Society 1992-93. I am an independent consultant on nuclear power safety, energy policy and non-proliferation. Currently I am Center Affiliated Scholar at the Center for International Security and Cooperation at Stanford, working on a book on the U. S. policy dating back to President Jimmy Carter to oppose reprocessing of civilian nuclear power reactor spent fuel.