

September 29, 1999

Comments by Paul Genoa (202-739-8034) at NRC Meeting 9/23/99

1. Inventory question; Industry needs to clear materials out on a daily basis. This includes all materials, for example, workers, clothing, shoes, vehicles, tools, equipment, consumables, etc. NRC's focus appears to be too limited and should be expanded to the true inventory of materials that require clearance.
2. What is needed is a clearance standard that establishes what materials will or will not require control? Life cycle assessment of materials moving in and moving out should be performed on all materials to understand the impacts of this proposed standard.
3. The industry does not expect that avoided LLW costs will be a major driver in favor of the rule, but rather we are concerned that the administrative costs of associated materials management will be excessive if a practical standard is not established.
4. Another decision driver supporting a standard is the cost of future liabilities. Without a standard, or with one that changes with available technology, the industry past practices are always subject to attack based on "20-20 hind sight." We believe that the establishment of a practical standard that clearly protects public health will limit much of the liability that currently exists due to the lack of a consistent standard. We hope that completion of a rulemaking by the NRC will solve these liability issues.
5. If a standard is developed that is so prohibitive to implement that the use of nuclear technologies are no longer viable, the cost benefit should be easy. Industry has large volumes of information regarding the benefit associated with the use of those technologies and would be happy to make it available to the NRC for use on the rulemaking effort.
6. Current practices are related to detection limits regarding materials leaving the RCA and not on a standard.

The public are fearful of radiation. The media love it, it's sensational. Politicians will politicize it. That is the status quo.

To the extent the NRC conducts workshops and rulemaking activities that build public trust and confidence, it is a net benefit to the industry and the public. To the extent that the NRC's activities result in (or provide others with an agenda the opportunity to create) a loss of public trust and confidence, then the industry and the public have been harmed by those actions and a cost has been incurred. This is the true cost / benefit that must be calculated.

Avoid the cost by providing the benefit. Build public confidence by establishing a tough practical standard through a process that generates trust, don't enforce/create a stigma by framing the issue as "how much extra radiation is OK for the public just the save the industry a buck."

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