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PROPOSED RULE **PR 20**  
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# MEMORANDUM

To: To Whom It May Concern

November 26, 1999

From: Stephen W. Duce

Subject: Rulemaking for Clearance

It is my belief that reuse of low-level radioactively contaminated materials can be safely accomplished. I further believe that this position is supported by the International Atomic Energy Agency as evidenced by their moving forward on a standard for release of volumetrically and surface contaminated materials. Their standard is based upon a 10 uSv/y dose to a member of the public. I offer that there are many within the nuclear community that believe as I do, as evidenced by the recently accepted and published ANSI N13.12 standard on the release of volumetrically contaminated items.

I fear that the general public has been given a wrongly slanted view concerning the health risks associated with low-levels of radioactivity and low doses, i.e., on the order of a few tenths of a percent of that experienced from natural background. Please allow this rule to pass, giving a vote of confidence to what we know about radioactivity and its health affects and at the same time sending a thumbs down to unwarranted fears and misconstrued information that is currently in vogue within the United States.

3112 Directors Drive  
Knoxville, TN 37923

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