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PROPOSED RULE

71
(65 FR 44360)



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Buyers Up • Congress Watch • Critical Mass • Global Trade Watch • Health Research Group • Litigation Group
Joan Claybrook, President

September 20, 2000

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555.
Attention: Rulemaking and Adjudications staff.

Dear Sir or Madam:

I am writing to request a 60 day extension of the comment period on NRC's proposal to "harmonize" U.S. transportation safety standards with those of the International Atomic Energy Agency. (10 CFR Part 71, Major Revision to 10 CFR Part 71: Compatibility With ST-1--The IAEA Transportation Safety Standards--And Other Transportation Safety Issues, Issues Paper, and Notice of Public Meetings; Proposed Rule). This request is premised on my belief that the information provided by the NRC in its white paper is insufficient and fails to adequately characterize the changes proposed through adoption of the IAEA standard.

Rather than preparing comments on NRC's white paper, I've been forced to track down information from the Department of Energy (DOE), the Department of Transportation (DOT) and the International Atomic Energy Agency (IAEA) that should have been provided by your agency. After viewing the information I have received from DOT and DOE, I can not help but conclude that the NRC has failed to provide the public with an adequate analysis of the impact of these proposed changes.

At the public meeting on August 10th, NRC could not provide the public with an analysis of whether these proposed standards would increase or decrease the radio-nuclide concentrations. In fact, NRC could not even enlighten the public as to which radionuclides would be effected by the proposed changes. In regards to Uranium Hexafluoride, the NRC acknowledges that "a detailed confirmation of the compatibility of the two standards has not been performed." Yet the NRC is seeking to supplant U.S. safety standards with those of the IAEA.

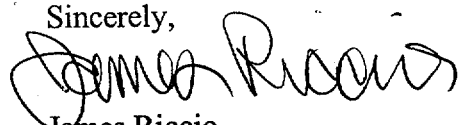
If the NRC wants public input into its decision making process it must provide sufficient information to make that input meaningful. Unfortunately, in this instance, that has not been the case.

Template = SECY-067

SECY-02

Ralph Nader, Founder

Sincerely,

A handwritten signature in black ink, appearing to read "James Riccio". The signature is fluid and cursive, with the first name "James" and last name "Riccio" clearly distinguishable.

James Riccio

Senior Analyst

Public Citizen's Critical Mass Energy and Environment Program

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