

DOCKET NUMBER
PROPOSED RULE PR 71

(21)

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To: <cag@nrc.gov>
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Subject: Suggestions for 10 CFR Part 71 v. IAEA

(65 FR 44360)

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Please include this COMMENT on major revision to 10 CFR Part 71:
Compatibility with ST-1-The IAEA Transportation Safety Standards.

Additional Issue

I am concerned for the fears in the general public and the anti-nuclear protesters. To help reduce such fears, I suggest the following sign (with correct numbers) be posted on both sides of any canister of spent nuclear fuel while it is being transported by rail or truck. The letters should be at least 2.5 centimeters high. This sign will convey the idea that a safe distance exists, that greater distance is safer, and that lower exposure (ALARA) is desirable. The linear, no-threshold theory demands ALARA until it can be proven incorrect (actually, I believe it to be correct).

FOR UNBROKEN CANISTER, MAXIMUM ALLOWED EXPOSURE:

	HOURS PER DAY	DISTANCE AWAY
(RADIATION	EITHER 2	1 METER (3.3 FEET)
LOGO)	OR 8	5 METERS
	OR 24	9 METERS

PREFERRED EXPOSURE: AS LOW AS REASONABLY ACHIEVABLE

Note: these are my calculated distances based on a maximum of 20 milirems per day and a rough model. Calculated distances for allowed exposures were rounded up to next whole meter.

Issue 1

The sign would also illustrate my suggestion regarding the use of SI units: In countries not fully comfortable with SI units, allow one parenthetical equivalence in their familiar unit for each type of quantity mentioned, on each communication. This will encourage thinking in terms of SI units, keep communications simple, yet allow a gentle transition as long as it is deemed necessary.

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