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From: <lovetribe@mail.com>  
 To: TWFN\_DO.twf4\_po(CAG)  
 Date: Fri, Dec 3, 1999 3:05 PM  
 Subject: NRC RuleForum Form Submission: DO NOT RECYCLE NUCLEAR JUNK INTO HOUSEHOLD ITEMS

Who: joey chang  
 Organization: love tribe  
 Email: lovetribe@mail.com  
 Re: DO NOT RECYCLE NUCLEAR JUNK INTO HOUSEHOLD ITEMS  
 Comments:

LISTEN TO WHAT THIS GUY HAS TO SAY.

stop treating the public like they're you're guinea pigs, you darn capitalist pigs.  
 i am so god damn sick of you government people thinking you can pull as many fast ones on us as you want. just stop being so venal.

for the love of god, do right and stop this injustice

>>Dear Secretary Meserve,

>>

>>I am writing to ask the Nuclear Regulatory Commission to isolate

>>radioactive

>>wastes and materials and anything they contaminate, no matter what level.

>>The radioactive legacy of atomic weapons and energy production should be

>>isolated from the public and the environment.

>>

>>The NRC should also extend the comment period on releasing radioactive

>>waste

>>into commerce to at least September 2000. This issue is too important to

>>act

>>hastily upon and it should be fully debated by the public. Several more

>>months are necessary to engage American consumers and determine if they

>>want

>>their families put at risk by exposure to radioactive household items.

>>

>>The public has spoken before on this issue. We still do not want nuclear

>>power and weapons wastes "released," "cleared," deregulated, exempted,

>>generally licensed,

>>designated "de minimis," "unimportant," or BRC-below regulatory concern,

>>or

>>by any other creative, direct or deceptive means, allowed out of nuclear

>>facilities and into the marketplace or the environment, at any level.

>>

>>The current methods of releasing radioactive wastes from commercial

>>licensees and weapons facilities must immediately cease. No future

>>radioactive releases should be permitted and a full accounting and

>>recapture

>>of that which has already been released should commence.

>>

>>Using radioactive wastes in consumer products poses unnecessary,

>>avoidable,

>>involuntary, uninformed risks. The consumers, the producers, the raw

>>materials industries don't want these radioactive wastes or risks.

>>

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>> It is not credible to believe computer models can calculate and  
>>accurately

>>predict any or ALL of the doses to the public and the environment from all  
>>of the potential radioactivity that could be released over time.

>>Projections

>>of "acceptable" or "reasonable" risks from some amount of contamination

>>being released are meaningless and provide no assurance. Monitoring for  
>>the

>>specific types and forms of radioactivity that could get out, can be very

>>expensive and tricky to perform. Hot spots can sneak through. We can't

>>trust

>>the nuclear generators to monitor their own releases.

>>

>> No matter what level the NRC sets for allowable radiation risk, dose or

>>concentration, it will be difficult to impossible to measure, verify and

>>enforce. Who is liable if the "legal" standards NRC intends to set are

>>violated? For decades the public has clearly opposed releasing radioactive

>>materials into commerce. We continue to do so.

>>

>>Naturally occurring background radiation cannot be avoided (except in some

>>instances for example, reducing radon in homes) but its presence in no way

>>justifies additional, unnecessary, involuntary radiation exposures, even

>>if

>>those exposures might be equal to or less than background. Nor does it

>>justify shifting the economic liability from the generators of radioactive

>>wastes and materials to the economic and health liability of the recycling

>>industries, the public and the environment.

>>

>>We fully support the complete opposition and "zero tolerance" policies of

>>the metal and recycling industries, the management and the unions. We

>>appreciate their efforts, not only in opposition to legalization of

>>radioactive releases, but in their investment in detection equipment and

>>literally holding the line against the radioactive threat to the public.

>>They should not have to be our de-facto protectors. The NRC, DOE and EPA

>>must act to prevent the dissemination of radioactive wastes into recycled

>>materials and general commerce. The problems that have been experienced by

>>the steel recycling industry with "generally-licensed sealed sources"

>>getting into their facilities and costing tens of millions of dollars to

>>clean up should serve as a warning not to let any other radioactive wastes

>>and materials out of regulatory control.

>>

>>The fact that radioactive waste is already getting out should not be used

>>to

>>justify legal levels allowing more out. The NRC, EPA and DOE should

>>prevent

>>future and correct past releases. The fact that other countries are

>>releasing radioactive materials into the marketplace is no excuse for us

>>to

>>legalize it. The United States should take the lead in preventing

>>contamination of the international marketplace. We protect ourselves best

>>by

>>not facilitating international radioactive commerce.

>>

>>The fact that it is difficult and expensive to monitor and detect

>>radiation  
>>does not justify its release. It is all the more reason to prevent any  
>>wastes getting out, so we don't have to check routinely for contamination.  
>>The nuclear industry and regulators should be aware of what materials at  
>>reactor and weapons sites are wastes and which have been contaminated.  
>>Those  
>>materials must be isolated, not released, at any level.  
>>  
>>The mindset of the NRC appears convinced that it should legalize  
>>radioactive  
>>wastes being recycled into the marketplace. The NRC has stated in its  
>>staff  
>>requirements memo that the standard must allow "releases" to take place  
>>and  
>>that all radioactive materials will be eligible for "clearance." This  
>>means  
>>that the NRC is not seriously examining all of the options available, such  
>>as non-release, even though the National Environmental Policy Act (NEPA)  
>>requires all options to be considered.  
>>  
>>Furthermore, the NRC is relying on a private contractor called Science  
>>Applications International Corporation (SAIC) to prepare the technical  
>>basis  
>>for the proposed regulation. This is a blatant conflict of interest. The  
>>NRC  
>>has not publicly disclosed the relevant economic interests of SAIC. The  
>>NRC  
>>has not notified the public that SAIC has simultaneously been working with  
>>or for other corporations with substantial economic interests in the  
>>Commission's determinations in this rulemaking. In particular, since  
>>mid-1996, SAIC has been the teaming partner of British Nuclear Fuels, Ltd.  
>>(BNFL) under a quarter billion DOE contract for recycling unprecedented  
>>amounts of contaminated radioactive metallic waste. This situation calls  
>>into question the entire NRC process.  
>>  
>>In conclusion, the comment period should be extended and the NRC should  
>>serve the interests of the public instead of the nuclear industry and  
>>prohibit the release of radioactive materials into commerce.  
>>  
>>Sincerely,  
>>  
>>  
>>Noel Petrie  
>>Legislative Assistant  
>>Public Citizen's Critical Mass  
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>>