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ATTN: NRC Rulemaking and Adjudications Staff

OFFICE

The proposed rules for release and recycling of radioactive materials into the market place are fundamentally flawed and should be thrown out altogether. The basic idea behind allowing radioactive metals to be salvaged as scrap and put into the waste stream assumes that if the radioactive materials are mixed with enough non-radioactive materials, effective dilution will occur. However, whenever there is a chaotic or random mixing of atoms, there will also be randomly distributed "hot spots." That is, the radioactive atoms will not be uniformly distributed through their new medium. Some points in the recycled metal will be highly radioactive. In fact sometimes, spots will be created in the new metal that will be even more radioactive than the average concentration of radioactivity in the original contaminated metals. This is the fundamental nature of random mixing. To ignore this fact flies in the face of basic physics and leaves the government open to lawsuits. The NRC will be criminally negligent if it ignores the poisonous nature of these radioactive materials and allows them into the biosphere.



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