

(504)

DOCKETED  
USNRC

**From:** <Gregory.Gerdeman@mcmail.vanderbilt.edu>  
**To:** OWFN\_DO.owf5\_po(SECY)  
**Date:** Wed, Dec 22, 1999 12:07 PM  
**Subject:** Radioactive "recycling"

'99 DEC 23 AM 47

DOCKET NUMBER  
 PROPOSED RULE PR 20  
 (64FR35090)

Gregory Gerdeman  
 1907A 18th Ave South  
 Nashville, TN 37212  
 December 22, 1999

NRC Chairman Richard Meserve,  
 U.S. NRC  
 Washington, DC 20555

Attn: Rulemaking and Adjudications Staff  
 Re: NRC rulings on radioactive "release" and "recycling."

Dear Chairman Meserve,

I would like to express my strong intent that the nuclear industry in the U.S. not be permitted to continue with programs of recycling or releasing radioactive materials. As a public citizen, I demand that there be a prohibition on release of any metals exhibiting radioactivity above natural background levels. This kind of release should be halted immediately, and I believe that the public has a right to know what level of release has occurred already, and where it has gone.

I also plead with the NRC to extend the period of comment on this issue. People do not know it is going on, and they deserve to know. However, when popular media does not present the issue to them, it simply takes time.

I am familiar with the effects of radiation on the human body, as are many of my colleagues. My perspective is as a Ph.D. candidate experienced in biomedical research (Department of Pharmacology, Vanderbilt University). I say this to put perspective on the following two points:

1) To say that low level ionizing radiation will not have lasting effects on human physiology- especially germline mutations effecting reproduction- when it is in close contact, is an unsupportable stance. That is because it is unprecedented. Models based on shorter-term exposure or high-atmosphere exposure can give clues, but they cannot predict the future. Likewise, the fact that background natural radiation exists does not justify increasing our exposure. I believe that the potential for damaging the human population is very great, and absolutely not worth the risk. The industry should not be allowed to profit off of low standards for human life.

2) I have never spoken to a colleague about the current issue of radioactive recycling who has not been fundamentally opposed to the idea. That is the truth. Yet I am aware that most of them have not commented. The fact that I, who am aware of particulars of the issue, am only just now writing for comment is indicative of how detached people truly feel from actually impacting public policy. Please weight public comments accordingly, and please extend the comment period. I do not stand to profit in large, directly tangible ways from

PDR PR 2064FR35090

DS10

expressing my convictions- unlike lobbyists and scientists under the corporate payrolls of the nuclear industry. I am thinking of the future, in a society that is utterly distracted by the present.

So many factors contribute to my opposition to radioactive recycling. For one example, the physical realities of volumetrically contaminated nickel demand that it should be sequestered as a hazardous substance (not that I think current "unlined pit" practices of radioactive disposal to be acceptable). From another angle, safety records and ethical histories of the US and British companies to be involved in administering radioactive release should create serious questions of credibility and intent. Please put a higher value on the words of the public and the health of our future generations than on the business agendas of these entities.

Sincerely,

Gregory Gerdeman