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Subject: Radioactive metal recycling

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Attn: Rulemaking and Adjudications Staff.

Consumers have a right to know whether components THEY believe to be dangerous are present in a product. This right is removed by allowing contaminated metals, whatever the level of radioactive contamination, into the waste stream for use by manufacturers (who also have a right to know what's in the raw materials they use - mandated by the Employee Right To Know Act - ERTKA).

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 ADJUDICATION

The only conscionable way in which radio-emitting metals from nuclear power or nuclear material processing facilities should be considered for re-use is to insure that contaminated metals are re-used only in facilities where human and environmental exposure are responsibly controlled. These metals need to be tracked from the decommissioning site through the recycling process and all the way to the end user of products made from the metal, and the end user needs to be accountable for any exposure of humans or the environment to radiation emitted by the final product.

Consumer freedom of choice and ERTKA both support the idea that it is up to the individual to decide what is safe. Under ERTKA, no-one can be forced to use or to work in the presence of substances they believe to be harmful. Consumers deserve the same protection. Maybe the springs in a reclining chair (as an example) aren't radioactive enough to exceed government-mandated maximum permissible exposure levels. All that means (to me) is that that reclining chair can legally be sold. It doesn't mean that the consumer doesn't have a right to know that radioactivity is present, and to decide, on the basis of that information, to buy another brand if he or she chooses.

Failure to track and account for radio-emitting metals takes away consumer choice. I protest any decision which allows radio-emitting metals to enter the waste stream without cradle-to-grave monitoring and accountability.

Sincerely,

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