

DOCKET NUMBER  
PROPOSED RULE PR 20  
(64FR35090)

DOCKETED  
December 22, 1999

Secretary  
US NRC  
Washington, DC 20555

'99 DEC 29 P5:19

OFF  
ADJ

Attn: Rulemaking and Adjudications Staff  
RE: Recycling and re-use of <sup>radioactive</sup> solid materials

My comment is simply this: no matter what standard you set, any allowable dose above zero is unacceptable for these reasons:

- 1) a dose-based standard is unmonitorable, and unenforceable, while absolute isolation of human-produced radioactive solids is monitorable, and enforceable.
- 2) There is no benefit to the public in allowing this deregulation, and much foreseeable harm. There is no way to monitor cumulative doses.
- 3) the NRC will be widely perceived as pandering to nuclear and scrap metal industry interests, and will lose all credibility as an agency employed to protect the commonwealth & health. If you do this, you should all be fired.
- 4) No additional exposure is acceptable - especially to those of us who live in the vicinity of nuclear reactors and are daily reminded of the risks we face when our warning radio goes off at all hours of the day & night, and we are informed <sup>in writing</sup> where our schoolchildren will be taken to be decontaminated in the event of an "event"!
- 5) Currently, the public cannot know how much radiation they are exposed to on a daily basis from "allowable risk" compliant nuclear facilities. They won't tell you how much, or what isotopes, they are releasing under normal operating conditions. So how can we protect ourselves from accumulating unacceptable doses if you allow the re-use ~~of~~ and ~~the~~ recycling of now-isolated materials into consumer goods? There would undoubtedly be no labeling to warn us - we can't even be allowed to make our own decisions about irradiated food, for heavens sake.
- 6) Who are you trying to fool? These proposed regulatory changes represent an abdication of responsibility on the part of NRC.