

From: Zachary Robinson <robinson@cs.ecu.edu>
To: OWFN_DO.owf5_po(SECY)
Date: Tue, Dec 28, 1999 3:41 PM
Subject: oppose recycling nuclear waste

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TO: Richard Meserve, Chairman
 US Nuclear Regulatory Commission
 Washington DC 20555
 ATTN: Rulemaking and Adjudications Staff

OF
 ADA

FROM: Prof. Zachary Robinson

I fully OPPOSE a threatened NRC/DOE program that would permit recycled nuclear waste in consumer products:

DOCKET NUMBER
 PROPOSED RULE **PR 20**
 (64FR35090)

- * The resulting increase in cancer deaths is unacceptable.
- * Planned environmental dispersion and subsequent loss of control of these hazardous materials is unacceptable at any level of concentration.
- * We would lose any authority to prevent nuclear waste producers in other countries whose manufactured goods we import from engaging in such dangerous practices.

We do not want nuclear power and weapons wastes "released," "cleared," "deregulated," "exempted," "generally licensed," designated "deminimis," "unimportant" or BRC -- below regulatory concern -- or by any other means allowed out of nuclear facilities and into the marketplace or the environment, at any level.

Once these radioactive wastes enter the recycling stream, recovering or controlling them will be outside the ability of anyone, citizens, government or industry.

No matter what level the NRC sets for allowable radiation risk, dose or concentration, it will be difficult or impossible to measure, verify and enforce.

Using radioactive wastes in consumer products poses unnecessary, avoidable, involuntary, uninformed risks. The consumer, the producers and the raw materials industries don't want these radioactive wastes or risks.

The NRC should also extend the comment period to at least September 2000. This issue is too important to act hastily upon and it should be fully debated by the public.

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

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

The fact that radioactive waste is already getting out into the environment should not be used to justify legal levels allowing more releases. The NRC, EPA and DOE should prevent future releases and try to correct past releases. The United States should take the lead in

preventing the contamination of the international marketplace.

Sincerely,

Prof. Zachary Robinson