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Chairman Richard Meserve,  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555

Attention: Rulemaking and  
Adjudications Staff

Dear Secretary Meserve,  
Groundwork for a Just World is a social justice organization of approximately five thousand members. I write as the organization's environmental justice issues-person to ask the Nuclear Regulatory Commission to isolate radioactive wastes and materials and anything they contaminate, no matter what level, from the public and the environment. Isolate the radioactive legacy of atomic weapons and energy production.

We do not want nuclear power and weapons wastes "cleared," "released," deregulated, exempted, generally licensed, designated "de minimis, unimportant, or below regulatory concern," or allowed out of nuclear facilities and into the marketplace or the environment at any level by any creative, direct or deceptive means. Stop the current methods of releasing radioactive wastes from commercial and weapons facilities. No future radioactive releases should be permitted and a full accounting and recapture of that which has already been released should begin.

Using radioactive wastes in consumer products poses unnecessary involuntary and uninformed risks. Consumers, producers, and raw materials' industries don't want these radioactive wastes or risks. Computer models cannot calculate and accurately predict all doses to the public and the environment from all of the potential radioactivity that could be released over time and no matter what level the NRC sets for allowable radiation risk it will be difficult to measure, verify and enforce.

While naturally occurring background radiation may not always be avoided this in no way justifies additional, unnecessary, involuntary radiation exposures, even if those exposures are equal to or less than background. Nor does it justify shifting the liability from the generators of radioactive wastes and materials to the recycling industries, the public and the environment.

We fully support the complete opposition and "zero tolerance" policies of the metal and recycling industries,

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management and unions. We appreciate their investment in detection equipment and that they are holding the line against the radioactive threat to the public. The NRC, DOE and EPA must act to prevent the dissemination of radioactive wastes into recycled materials and general commerce. The problems experienced by the steel recycling industry should serve as a warning not to let any other radioactive wastes and materials out of regulatory control.

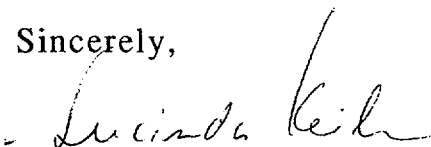
The fact that radioactive waste is already getting out does not justify legal levels allowing more. Nor does other countries' release of radioactive materials excuse us to legalize it. The United States should lead in preventing contamination of the marketplace. We are best protected by not facilitating international radioactive commerce. The difficulty and expense of monitoring and detecting radiation does not justify its release and is all the more reason to prevent any wastes getting out.

The nuclear industry and regulators should know what materials at reactor and weapons sites are wastes and have been contaminated. Those materials must be isolated, not released, at any level. The NRC mindset appears to be to legalize radioactive wastes being "recycled" into the marketplace. The NRC has stated in its staff requirements' memo that the standard must allow "releases" and that all radioactive materials will be eligible for "clearance." This means the NRC is not seriously examining all options such as non-release, even though the National Environmental Policy Act (NEPA) requires all options be considered.

Furthermore, the NRC reliance on a private contractor, Science Applications International Corporation (SAIC) to prepare the technical basis for the proposed regulation is a blatant conflict of interest. The NRC has not publicly disclosed the relevant economic interests of SAIC, nor notified the public that SAIC is simultaneously working for other corporations with substantial economic interests in the Commission's determinations in this rulemaking. This calls into question the entire NRC process.

In closing, the comment period should be extended into mid-2000, and the NRC should serve the interests of the public instead of the nuclear industry and prohibit the release of radioactive materials into commerce.

Sincerely,



Lucinda Keils