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From: "Craig Thorley" <cthорley@envirocareutah.com>
To: OWFN_DO.owf5_po(SECY)
Date: Wed, Dec 22, 1999 5:48 PM
Subject: US NRC Rulemaking and Adjudications Staff: release of solid materials from NRC licensed facilities

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ADJ...

Envirocare of Utah, Inc. (Envirocare) is a leader in the low-level radioactive and mixed waste treatment and disposal industry. As such, we have a keen interest in any rules the Nuclear Regulatory Commission (NRC) may develop that establish release standards for waste from NRC-licensed facilities. Envirocare recognizes that it is appropriate to establish a scientifically defensible standard for materials release. NRC should be careful to make sure that there is a scientific consensus on this matter, however.

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

If waste material is above such health threshold, it should be sent to a licensed low-level radioactive waste disposal facility such as Envirocare. There is no basis to determine that radioactive waste from an NRC-licensed facility (or from an Agreement State-licensed facility) should be sent for disposal to a hazardous waste landfill or a municipal landfill. Such facilities have not been designed or sited with the expectation that they would be accepting radioactive waste, nor do they have the operational controls and requirements that apply to facilities like Envirocare.

Sincerely,

Craig Thorley
 Envirocare

Original to follow by US mail

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