

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

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US NRC

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# CITIZENS AWARENESS NETWORK

December 21, 1999

US NRC  
Attn: Rulemaking and Adjudication Staff  
Washington, DC 20555

Re: CAN's comments on proposed rule for radioactive release and recycling...64 FR 35090  
6/30/99

To Whom It May Concern:

By this letter, the Citizens Awareness Network formally submits comments on the release and recycling of radioactive materials. CAN is a volunteer, grassroots organization with chapters in reactor communities in MA, CT, VT and NY. We have over 2,000 supporting members and believe we represent the views of many thousands more.

Living and working in reactor communities, we have already experienced decades of planned and unplanned radioactive releases from nuclear power reactors. We have seen northeast nuclear reactors disregard NRC rules, regulations and technical specifications and lose control of their licensed radioactive materials. Plumes of tritium and other radionuclides are presently in the aquifer under Yankee Rowe in MA, and CT Yankee in CT. Radioactive building materials and tools were scattered throughout CT and beyond by ineffective radiological control by management. Reactor sites contain deadly transuranic contamination produced by operating with faulty fuel rods. And, every low-level radioactive waste dump in this country is leaking.

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With decommissioning of four reactors in New England, we see the magnitude and scope of radioactive contamination both on site and off. With the submittal of the License Termination Plan at Yankee Rowe we have seen the corporation's attempts to minimize the expense of clean up by limiting the evaluation and remediation of nuclides in the soil.

This rulemaking comes at a time when the floodgates of radioactive waste are just beginning to open addressing industry concerns by emphasizing the financial burden of safe clean up and management of radioactive waste. This rule has the potential to over expose people, as it does not calculate multiple nuclide exposures or the synergistic effects of nuclide exposure with other known toxins such as PCBs or dioxin. Furthermore, the exposures are based on men and the exposures of women, children and fetuses are not calculated (an act of discrimination). Lastly, the American people have a right to products free of radioactive contamination and a right to know about radioactivity in any products that they may purchase.

We find unacceptable, the level of radioactive contamination already existing in our environment from the operation of nuclear reactors, the atmospheric bomb testing of the 50's and 60's, and all the contaminated Department of Energy and the Department of Defense nuclear research and weapons sites from Hanford in WA to Savanna River in GA, Rocky Flats in CO to West Valley in NY and everywhere in-between. What we as citizens already see is the radioactive America that we are leaving for our future generations to deal with. We are tired of getting the short end of the "too cheap to meter", "friendly atom" campaign. What we want is restriction of radioactive isotopes in our lives, not added assault on our bodies and our children's bodies from the recycling of radioactive materials. We, therefore, object to this and any other rulemaking that will release radioactive metal, concrete, plastic, soil and other material from commercial nuclear power and weapons sites, directly via commercial processors, to the marketplace. We also object to these materials being released to incinerators and regular landfills. We furthermore request that you identify, track and recapture the radioactive waste that has already been released from nuclear power and weapons facilities by federal and state regulators.

The capturing of contamination already released, and pollution reduction and elimination through identification and tracking of contamination for safe isolation, is your agency's concern, not relieving the financial burden of the nuclear industry by providing a method by which rad waste can be dispersed to an unsuspecting public.

The dispersal of this material would provide a public benefit, which to your agency's estimation overwhelms the risks. It would be helpful if the public "benefit" were clearly defined.

This rulemaking has sweeping consequences for our nation and even the world. We request that

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you give the public at least eight more months to comment.

Sincerely,

Deb Katz  
Executive Director

Kim Medeiros  
MA Boardmember

Sal Mangiagli  
CT Boardmember

Derrick Jordan  
VT Boardmember

Tim Judson  
NY Boardmember