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

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USPHC

From:  
Jeff Christopherson

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To:  
The United States Nuclear Regulatory Commission.

re: Release of Solid Materials at Licensed Facilities.

OFFICE OF  
PUBLIC AFFAIRS  
ADVISOR

Dear NRC,

I've recently learned that you are considering a rule change to allow radioactive metals into the general metal supply.

By your own study in 1990, the release of contaminated metals at the industry proposed limit of 10 mrem would produce 4 additional cancer deaths per 10,000 people. Given a population of 250 million, this amounts to 100,000 additional cancer victims in the United states alone.

So tell me, why would you consider such a thing? Have you no regard for others? Are you simply gambling that one of the deaths won't be your own or someone in your family?

One of your own staffers told me that I should not be concerned, given that we are constantly surrounded by low levels of natural radioactivity. To which I say, why make it worse? To follow that line of reasoning, we should go ahead and eat away the ozone layer, because we already have a low level of natural ultraviolet light. "Don't Worry, Be Happy" should not be the advice of the Nuclear Regulatory Commission.

If this metal is released, it will be out there, unregulated, untraceable, poisoning everyone who comes in contact with it for thousands of years. It could find its way into our pots and pans, silverware, fillings, braces, children's toys, pocket change, bedframes, cars, virtually anywhere metal is used.

You currently limit liquid and gaseous wastes to "as low as is reasonably achievable". I insist that you apply this rule to solid waste as well, as zero is reasonably achievable. I also insist that you not listen to the parties that are pushing you into this rule change, that stand to make a profit if you rule in their favor. Their interests are not in the best interests of public health.

I also question this forum. Do you expect the general public to discover this proposed rule change on your web site? Or in the public record? If you want a proper response, get a major news carrier to do a few prime time minutes on it, then see what the public has to say. I ask that you extend the comment period. I'm sure I can find some people who have something to say about it, once they hear about it.

Sincerely,

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