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From: <SAPL99@aol.com>  
To: TWFN\_DO.twf2\_po(NRCWEB)  
Date: Tue, Dec 21, 1999 3:38 PM  
Subject: NUREG-1640

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USNRC

'99 DEC 27 A11 :15

Dear Sirs,

Please accept this e-mail as the Seacoast Anti-Pollution League's strongest urging to reconsider releasing any and all radioactive waste into the national recycling process.

OFFICE OF THE  
GENERAL COUNSEL  
ADJUTANT GENERAL  
AFF

SAPL was the first 501(c)3 citizen environmental protections group to become involved in litigation before the NRC aimed at stopping the siting of the Seabrook Station nuclear power plant on the New Hampshire Seacoast. After the licensing of one of the proposed reactors in the late 1980s, SAPL took on a citizen oversight role as concerns Seabrook Station and, over the years, has been influential in pushing plant operators to make procedural and equipment changes that positively impact the local environment, while protesting any changes SAPL felt could be detrimental to public health and safety.

In the process of these activities, SAPL staff and members have become relatively knowledgeable about the impacts of radioactive substances on our environment. We have learned that this area already suffers from high background radiation as a result of its granite base. We have learned that Seabrook Station is not radioactive neutral in that it adds small amounts of additional radiation to our already high background rates.

We have also come to understand that there is scientific evidence that continually receiving even small doses of radioactivity can cause irreparable damage to the environment and the humans that inhabit it.

We also understand that disposal facilities for both high- and low-level radioactive wastes are becoming harder to find and more expensive to construct as more is learned about the consequences of radioactive exposures.

It is the concern of virtually all of SAPL's 350 members that economic pressures are what is driving this push to release more and more low-level radioactive waste into the recycling stream, and not concerns about public health and the impact of adding yet another source of radiation to the environment.

SAPL, therefore, calls on the NRC to isolate and control all radioactive wastes for the full duration of their biologically hazardous lifetimes, and to determine where radioactive wastes that have already been released are currently being used.

As we enter the 21st Century, the emphasis should and must be on removing from the environment those things which threaten the health and safety of those living on this planet. It is disheartening to see the NRC considering adding even more of these items to the already long list of substances that can negatively impact public health.

We ask that you withdraw NUREG-1640 and, in its place, develop regulations for the safe storage of radioactive materials no matter how low the expected dose.

Sincerely,  
Steve Haberman  
Field Director  
Seacoast Anti-Pollution League  
P.O. Box 1136

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