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From: jerise fogel <jfogel@creighton.edu>
To: OWFN_DO.owf5_po(SECY)
Date: Fri, Dec 31, 1999 3:58 PM
Subject: recycling nuclear waste

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To the NRC:

I am very much opposed (and I'm not alone in this, I assure you) to the releasing of radioactive materials, in whatever doses or amounts, into consumer products and the public domain. There is no good reason apart from the need to get rid of radioactive materials for this maneuver--and this method of "disposal" is extremely dangerous.

First, dosage: it is argued that the NRC should be setting standards (given that the EPA has refused to take on this job because of its overload in other categories of task) for industry, telling corporations and businesses how much radioactive material may be incorporated into their products. But what about overall dosage??? If the NRC is going to do any sort of control effectively, it needs to take into account that ALL these products may be being bought and used at once by many consumers, increasing the dosage to dangerous and unacceptable levels at random. Unless the NRC is prepared to decide also to set limits on WHICH materials may NOT be purchased and used AT THE SAME TIME in the same house or by the same person or group of persons, there should be a prohibition on consumer-product use altogether. Is the NRC going to come up with a chart for use by consumers that tells us all which products contain which amounts of radiation, and make that chart available, along with a calculator, in every commercial outlet? If not, there should be ZERO tolerance for radiation in the marketplace.

Second, the steel industry as protector: this is completely nonsensical. How could you possibly think that the steel industry's primary focus will be to protect its consumers from dangerous radiation in a case where its financial livelihood is at stake? Don't ask private concerns or groups of commercial concerns to do your job for you.

Third, compliance. No matter how low the dosages you recommend or set as guidelines, you will need to assure all of us that the industries controlled are actually using those dosages and no more. Don't set up a situation where you don't have the funds to monitor them, then complain when citizens bring lawsuits against you.

Fourth, international standards. It may be the case that Europe is considering standards--so be it. A "zero" standard is a standard, too. There is no reason for us to be shipping radioactive metal out to foreign countries--no matter how badly they need metal. There is also no reason for us not to forbid the importation of dangerous radioactive materials recycled into consumer products: there are plenty of international legal precedents for this kind of thing, and it need not become a big protectionist issue. Moreover, the U.S. leads the way in many respects in the eyes of the E.C. Why not take a stand that will favorably influence the stands of others, while protecting citizens' well-being?

I am truly appalled that the U.S. NRC would even *consider* the recycling

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of radioactive materials in this way. You need to stop listening to the mercenary voices of greedy and negligent owners of large businesses--the same owners who have been polluting our water, air and ground for over a century in order to make the big bucks--and start trying to protect the citizens of the U.S. and other consumers who don't have the money or influence of Big Business. What's good for GE is not necessarily good for the U.S., if you still believe that the U.S. is composed of PEOPLE.

Sincerely,

Jerise Fogel