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From: "Ron Stone" <ronhstone@hotmail.com>
 To: <chairman@nrc.gov>
 Date: Mon, Oct 16, 2000 12:04 PM
 Subject: Radioactive recycling

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I have just read the attached document and am alarmed that we may be allowing radioactive materials to get into metal products used in the home. Please take steps immediately to stop this dangerous practice.

Thank you.

Sincerely,
 Ronald H. Stone

U.S.: Recycling and reuse of radioactive metal

The United States Environmental Protection Agency has issued documents that lay the foundation for the recycling of radioactive metal from US nuclear power plants and nuclear bomb-making facilities. These documents, EPA's cost-benefit analysis and technical support document, will establish the technical basis for any decisions EPA makes on setting radiation protection standards.

(488.4847) CMEP - The Department of Energy (DOE) recently signed a contract allowing huge amounts of radioactive metal to be released. Before DOE can proceed with this irresponsible plan, it wants the Environmental Protection Agency (EPA) to set standards. EPA has begun this process by writing a Preliminary Technical Support Document and the Preliminary Cost-Benefit Analysis. These documents look at the feasibility of recycling radioactive scrap metal into consumer products. This is the beginning of a rule-making that could result in radioactive metal being made into strollers, appliances, bed frames, belt buckles--anything made from metal.

The EPA claims that establishing radiation-protection standards would ensure that public health is protected by preventing the release of highly contaminated radioactive metal. According to EPA, "(t)he goal of EPA regulation is to assure that if any metals are released, they will be released at safe levels and can be processed and reused with the confidence that they are safe". This, however, presupposes that there is such a thing as a safe dose of radiation.

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When EPA attempts to set an "acceptable dose", it should consider some of the most recent radiation and health studies. One such study funded by the DOE found that workers exposed to "acceptable" doses of radiation had a cancer risk at least six to eight times greater than those established by the National Cancer Institute's study of the Biological Effects of Ionizing Radiation

V (BEIR V). The UCLA study of workers from the Rocketdyne facility in Santa Susanna, California, found that one-third of workers who were exposed to radiation far below the national standard have died from cancer. (see WISE NC 478.4747: Exposure to "safe radiation" levels:

six times more cancer). The researchers from UCLA and the study's Oversight Panel concluded that although the cancer deaths attributable to radiation exposure were dose-related, they occurred at doses substantially below those considered permissible by US officials and international regulatory bodies, thus raising questions about the adequacy of current regulations.

There is not such a thing as a safe dose of radiation. Therefore, any standard establishing an exposure limit constitutes an over-exposure. Since the EPA acknowledges that the public will be exposed to radiation as a result of this recycling scheme, the agency should establish a population-dose limit based on a credible source term. If EPA is concerned with the fact that current criteria are inadequate to protect public health and safety, the EPA should establish a zero tolerance for release of contaminated metals.

While the EPA acknowledges that the volume of radioactive metal is expected to substantially increase as more nuclear reactors are decommissioned, its timetable estimates of the amount of radioactive waste to be recycled are woefully inaccurate. The EPA assumes that currently operating nuclear power plants would function for the 40-year term of the operating license.

However, no nuclear power plant has ever operated for the 40-year term. The DOE's Energy Information Agency estimates that as many as 25 reactors would close 10 years prior to the expiration of their operating licenses. Even the EPA's estimates may be too conservative given the recent spate of reactor closings.

The EPA admits that the current criteria used to release radioactive metal is not based

upon health risk. However, the EPA fails to acknowledge that the nuclear industry's current proposal is not based upon concern for the public health and safety either. What the nuclear industry now wishes to recycle is really low-level radioactive waste that under current regulations would likely be disposed of in a "low level" radioactive waste dump. Rather than paying the high fees for dumping this radioactive waste in a "low level" waste dump at Barnwell, South Carolina, the nuclear industry has determined that it would be more cost-effective to dump radioactive waste into the public domain under the guise of recycling.

This is the fourth time that the nuclear industry and its regulators are promoting the deregulation of radioactive wastes and materials. In the late 1970s, the NRC bowed to the pressure from the nuclear industry and began investigating the cheapest means for disposing radioactive metals from closed nuclear power plants. The NRC determined that recycling was the least expensive way to discard the waste.

To simplify the project, the NRC wrote a draft environmental statement as part of a proposed rule-making, exempting metal alloys containing radioactive residues from any standards. In response, consumer activists, environmentalists and unions together mounted an attack on the proposal and caused the NRC to back away from this irresponsible disposal of the waste.

Then, in 1986 and again in 1990, the NRC adopted two 'below regulatory concern' (BRC) policies. These policies would have released radioactive wastes and materials from regulatory control. The materials could have been used in everyday consumer products, manufacturing practices, or unloaded in household garbage dumps, sewers, and incinerators--all without notifying the public about the activities or their potential exposures. The EPA criticized the NRC's policies for being too lenient; the states, in turn, criticized EPA for being too soft.

Once again, a grassroots campaign was organized in opposition to this outrageous scheme. Local and state governments began passing ordinances and resolutions requiring ongoing regulatory control of BRC radioactive waste. As a result, in 1992, the US Congress revoked the NRC's BRC policies.

Unfortunately, the NRC has never given up the recycling scheme. After weighing various

options, the agency is now seeking to allow recycling of radioactive metal deemed of "marginal risk to safety". The EPA should require zero tolerance for radioactive material in consumer goods by developing a standard that bans any radioactivity in consumer products. The proposed practice is unacceptable from a health and safety perspective and any standard for release of radioactive metal will prove inadequate to protect the public health and safety.

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Radioactive metal also sold in UK.

Concern has been expressed in the United Kingdom's House of Commons by Liberal Democratic Members of Parliament about the recycling of radioactive metal from decommissioned nuclear plant for use in consumer goods. British Nuclear Fuels has sold about 7,000 tons of "decontaminated" radioactive metal from the Capenhurst de-enrichment plant. The metal, which remains mildly radioactive after decontamination, is used in the production of cars, windows and a wide variety of consumer goods, including kitchen equipment such as pans. BNFL claims the recycled metal cannot find its way into cans for food.

N-Base Briefing 115, 28 January 1998

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