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From: "Beth Tener" <tener.b@mindspring.com>
To: <tjn@nrc.gov>
Date: Mon, Oct 23, 2000 10:01 AM
Subject: Contaminated Soils

I am writing as part of the public comment on the proposal to allow nuclear power plant operators to market their radiologically contaminated soils for uses where the public could be exposed. I encourage you to abandon this plan.

Your risk assessment approach is unlikely to predict all of the consequences of purposely introducing contaminated soils into the environment. Natural ecosystems are so complex we are kidding ourselves to think we can predict accurately cause and effect, particularly over long time periods, which are typical of radioactive materials. Please consider human fallibility - I see a misplaced confidence that you can accurately predict all the exposure pathways. Also, consider the harm to current and future generations if you get it wrong. Is it worth the risk? If we recognize a risk we didn't predict, how can we ever get all that soil back again?

This seems to be an example of trying to insert a profit motive into what should be a cost of doing business for these nuclear facilities. The idea that "We're in the soils business" is ridiculous. They are in the business of creating power in a way that generates wastes that will be extremely hazardous for generations. This is a cost society must bear. As far as possible, our policy should be guided by making the entity that generated these hazardous materials bear these costs. These plants should have to pay for this WASTE to be contained and monitored closely - they should not allowed to profit from selling it and allowing it to be dispersed widely so the public has to pay the price in health impacts.

Sincerely,

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