

From: Kay Cumbow <jcumbow@greatlakes.net>
To: <Nrcprep@nrc.gov>
Date: Sat, Nov 18, 2000 2:07 AM
Subject: Corrected version - comments.

65 PR 44843

7-19-00

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This is a corrected version which I hope you will substitute. The public is not paid to make comments and does them besides doing their regular jobs.

Thank you, Kay Cumbow

Dear Mr. Meyer,

I realize this is a some minutes over the deadline, but I had technical problems with sending it out on our computer. Then, I sent the wrong one, and again had problems sending it. Since you probably won't see this until morning anyway, I would hope that you include it in the official comments. This is an issue crucial to the United States public and very few of the public even are aware of it.

Please send an acknowledgement to let me know you received these comments.

Thank you.

- Kay Cumbow and Alice Hirt

David L. Meyer, Chief
 Rules and Directives Branch, Office of Administration
 Mail Stop T-6D59
 U.S. Nuclear Regulatory Commission
 Washington DC, 20555-0001
 Nrcprep@nrc.gov

I am commenting on your report Human Interaction with Reused Soil: a Literature Search". It is my understanding you are taking comments until Nov. 17th at midnight.

First, let me say I strongly disapprove of ANY attempt to recycle or reuse radioactive soils ANYWHERE, for many reasons.

1. Studies done by the government in Hanford, on the Columbia River (as well as many other studies worldwide) have documented that many radionuclides concentrate in the food chain, much like DDT. Thus, food grown in radioactive soils could concentrate those radionuclides in much higher amounts. Any fish, or animals eating on those contaminated foodstuffs could concentrate the radionuclides further, possibly generating cancers, birth defects, even sterility, or other illnesses, depending on when they were exposed, and which radionuclides they were exposed to. Because human beings are at the top of the food chain, this spells big problems genetically for any foetus exposed to concentrated radionuclides, (if that foetus survives the exposure) as well as possible myriad health problems including cancers, immune diseases, heart disease to any human being exposed to concentrated radionuclides in chicken, beef, poultry, or even vegetables grown in radionuclide-contaminated soil.

There could easily be contamination of drinking water, for erosion of soils is a constant. Once in drinking water, or creeks or rivers or lakes (as

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contaminated runoff,) there is practically no way to retrieve/publically warn exposed populations (human as well as animal/fish life). Most drinking water is not monitored for radioactive substances on even a monthly basis. Usually it is yearly or longer, and then only for a select few substance such as radium, plutonium, cesium and iodine.

2. The public should not have to worry that their backyard soil where they grow their gardens, where their children play, where they walk barefoot, is contaminated. In rural areas, deer, pheasants and other animals they may feed on lands contaminated, and end up on hunter's tables, or worse have significant die-offs, and permanently affect the food chain in that area.

Do you remember Rachel Carson? This is exactly the same problem. We were killing off bald eagles, and doing great harm through the entire food chain due to bioconcentration. Many (not all) radionuclides concentrate in this food chain JUST LIKE DDT!! Some that don't still have a mighty kick in their unconcentrated form once living things are exposed. Some radionuclides have long 1/2 lives, so they end up being around for decades, or hundreds of years, or thousands of years. They can do their damage once or if they lodge in someone's fatty tissues, they can keep the damage up for many years.

If we could see or sense radionuclides without monitors, it would be one thing. But we can't. Most of the public do not own geiger counters, nor should they have to!! Also, most monitors are not sensitive enough to pick up many radionuclides once they are ingested into plants or animals.

Sincerely,
Kay Cumbow and Alice Hirt

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