

DOCKETED
USNRC

March 18, 2003 (8:13AM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

DOCKET NUMBER
PROPOSED RULE **PR 20**
(68FR 09595)

March 15, 2003

17

Dear Commissioners of Nuclear Regulation:

I have just reviewed the Nuclear Regulatory Commission's proposed "Rulemaking on Controlling the Disposition of Solid Materials" ...that originate in restricted or impacted areas of NRC-licensed facilities, and that have no, or very small amounts of, radioactivity resulting from licensed operations. [10 CFR Part 20.] This proposed rule was published in the Federal Register on February 28, 2003 (Volume 68, Number 40).

Please consider the following:

- Materials that test for no radioactivity should be able to be released for general use with no restrictions. In order to be certain of this, of course, any materials from licensed facilities would have to be tested. Given the cost of accomplishing this, it might be more cost-effective to instead take the alternative (as related in the proposed rule) of disposing materials in an EPA regulated facility.
- Do not underestimate the psychological impact on the citizenry, nor the responsibility that you hold on behalf of all our citizens. A few years ago I learned that radiological materials in other countries (e.g. Mexico, China) were finding their way into consumer goods. I have it on my list of things to do to get myself a Geiger counter (really). If this continues and if this country also loosens its standards such that consumers have

Template = SECY-028

SECY-02

doubts about the materials in the products they use, it will contribute to pessimism about our culture and economic system. There is no good reason for doing so. The amount of material which this rule would impact may be a large amount for any individual facility or even for the nuclear industry, but it amounts to a small portion of the stuff that this country disposes. Aside from being your duty as our overseers of the nuclear industry, preventing radioactively-tainted materials from reaching consumers/citizens makes good business sense and is a small price to pay (in the big scheme of things) for maintaining public confidence.

- This issue is another example of the high external costs from energy production through nuclear fission. Limiting and working to reduce the number of nuclear facilities will serve to lower the costs to society of disposal and safekeeping of radioactive wastes.

Sincerely,

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