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From: "Katharine Dodge" <kdodge@ptd.net>
To: "Secretary Nuclear Regulatory Commission" <secy@nrc.gov>
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Subject: Comments on Controlling the Disposition of Solid Materials (10 CFR Part 20)

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Nuclear Regulatory Commission:

Dear Secretary:

June 23, 2003 (11:22AM)

The U.S. Nuclear Regulatory Commission's (NRC's) proposed "rulemaking on controlling the disposition of solid materials" should be limited to those regulatory options which would strictly prohibit the deregulation of any solid materials containing, or contaminated with, manmade radiation, and require that such materials be disposed of only in secure, properly licensed facilities that are designed to completely isolate such radioactive waste from the biosphere.

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

WHEREAS the NRC's primary mission is "to protect public health and safety, and the environment from the effects of radiation from nuclear reactors, materials, and waste facilities," and WHEREAS the NRC has accepted the validity of the linear, no-threshold (LNT) model of human exposure to radioactivity, that "any increase in dose, no matter how small, results in an increase in risk" to human health, THEREFORE: the NRC will be derelict in its duty to protect the health and safety of the public it is there to serve if it continues to obstinately pursue a contradictory proposal that would, in fact, result in exposing the public to greater doses of radioactivity. This sentiment is revealed in the statement of NRC Chairman Richard Meserve, contained in the NRC Commission Voting Record of October 25, 2002, in which he advised that "it would not be appropriate to mask the Commission's continuing support for the release of solid material." It is a travesty of proper government regulation that the NRC is pursuing, in effect, a subsidy worth billions of dollars that rewards waste generators for irresponsibly scattering their waste into the unregulated environment and ducking responsibility for any of the consequences.

Under absolutely no conditions should nuclear waste be deregulated, dumped in unlicensed facilities that are not prepared to monitor for or contain radioactive waste, or allowed into general commerce.

I urge you to make sure that all radioactive material waste is restricted from general commerce and required to be isolated from the biosphere in an NRC- or Agreement State-licensed low-level waste site.

Further regulations and protections should be implemented as needed to fulfill said mission in a serious and responsible manner.

Sincerely,

Katharine Dodge