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United States Nuclear Regulatory Commission (NCR)
"Rulemaking on Controlling the Disposition of Solid Wastes"
(Radioactive Waste and Materials Release, 'Recycling,' disposal)
Scoping Process for Environmental Issues
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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Secretary, Nuclear Regulatory Commission,

I am writing about the scoping process to determine what the NRC will consider in its rule-making about the release of radioactive materials into commerce or landfills or maybe even incinerators. Let me say that I am a very worried citizen, a retired registered nurse who has long been concerned about the effects of radiation on human health, especially low-level radiation. I am also a retired teacher of chemistry, math, and physics so I am not totally without some understanding of radiation.

The primary mission of the NCR is "to protect public health and safety, and the environment from the effects of radiation from nuclear reactors, materials, and waste facilities." It should be crystal clear, then, that the NCR should be ISOLATING radioactive materials to prevent exposure to human or other living beings. The NCR should NOT be releasing ANY radioactive materials where contact with the public is possible. There is no SAFE level of exposure to radiation, no threshold below which radiation is safe; any increase in dosage of radiation carries an increased risk to human health (and the health of non-human animals as well). You should be protecting the public from any and all radiation exposures over and above those natural sources that cannot be avoided or exposures freely chosen for medical or other reasons.

Of the 5 options given by the NRC, only number 5 states clearly what should be done. The waste should be stored, managed and isolated for as long as it is hazardous (ie. until there is no detectable radioactivity and presents no other toxic characteristics) at facilities licensed for that purpose for radioactive waste. Existing regulations (10 CFR61) for nuclear waste disposal should be strengthened. NCR should use this rule making to truly devise ways to control radioactive waste, not release it from licensed control. The NRC should track and isolate all radioactive materials and things contaminated by them from the very beginning of the production cycle (mining) through all the intermediate steps to the final disposition of the wastes after power or weapons are made and used.

Option 1 which is continuing unrestricted release on a case-by-case basis is totally unacceptable. Do you know where that released radioactive waste has gone? What the NRC should be doing is tracking the released waste and studying how it has effected the persons or other life forms or the environment exposed to it. Just because the NRC doesn't know or hasn't seen the harm done, does not mean that there has been no harm done. Prove that it is not harmful! We have to start practicing the Precautionary Principle, especially for those who may have doubts about the ill effects of low-level radiation. All the research studies I have read over the years, lead me to believe that all radiation exposures carry health risks.

Options 2, 3, and 4 are all totally unacceptable because they do not protect persons and life forms. They favor industry not people and the environment.

Please make rules that fulfil your mission. You are to protect the public and the environment by regulating industry; your mission is NOT to promote the nuclear industry, which all your options other that 5 would do. We want to trust you, but you must then act with integrity. Thank you.

Sincerely,

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