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Subject: NRC Proposed rule:Comments on controlling the disposition of solid materials.

2457

To: USNRC Docket on scoping proposal for Controlling the disposition of solid materials.

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Although over the decades I have commented many times on "controlling the disposition of solid materials" in its many disguises and manifestations, I again use my Constitutional privilege "to petition the government for redress of grievances" of which I and the American people have many.

Since the last time I commented upon one of the manifestations of 'controlling the deposition of solid materials' where the NRC was trying to allow radioactive wastes into toys, kitchen utensils and everything else, there have been a few 'facts' that give perspective and put the actions or lack of action into context. A court in Florida ruled in favor a TV station for firing 2 TV news reporters who demanded that they would tell the truth. This was a case where the reporters wanted to tell the truth about recombinant bovine growth hormone, and the TV station feared the loss of milk advertisers.

The judge's ruling therein pointed out that there was no rule, regulation or law that required TV reporters tell the truth! I, similarly, point out that there is no rule, regulation or law that requires the NRC or any government official to tell the truth, and this scoping proposal shows that the NRC intends to take full advantage of that fact.

The reason that I have commented many times over decades on controlling the disposition of solid materials is that many proposed regulations, rules and policies have issued from the NRC and DOE on this subject under different titles. The most contentious title was 'below regulatory control.' This below regulatory concern was shortened to BRC. BRC was a concept to loose radioactive wastes into the environment with the only substantive control being that no one pathway would expose the member of the public to over a certain dose. Since there was no requirement to limit the number of pathways and exposures, the cumulative dose was unlimited.

The US Congress came to the rescue of our Nation and outlawed 'BRC'. BRC raises its head again in the guise of a scoping proposal to control the disposition of solid materials. This is a similar proposal to the BRC concept that caused Congress to rush to the aide of the Nation years ago.

Now we have an administration which demands its intelligence assets skew their findings so that documents are taken at face value although obviously forged, aluminum tubes are called uranium process devices although aluminum cannot withstand the corrosivity of uranium

hexafluoride, supposed locations for WMDs were never attacked although they were in areas controlled by anti-Saddam forces and in US declared 'no fly' zones.

With this perspective, the Nation is requested to comment upon a scoping proposal to loose radioactive waste into children' toys, kitchen ware, and everything else. The question of how skewed these proposals are is not discussed.

To top all this off the NRC analysis is limited and inappropriately truncated. I have previously requested that the NRC consider all the impacts of radioactively contaminating raw materials and consumer products. Thickness gauges use radioactive sources as standards to calibrate measurements. If raw materials and consumer goods are contaminated with radioactives, thickness gauges will have a tougher time measuring thickness leading to a lower standard for consumer goods where thickness is an issue. There are many devices that use radiation and are used in manufacturing. If we allow radioactives into the raw materials and consumer goods we shall call the quality of US consumer goods into question and reduce profits and marketability here and worldwide.

Marketability is not the only part of US competiveness that will be lost if we continue to contaminate our raw materials and consumer goods with radioactivity. The nanotechnology science has been taking its first steps into manufacturing. Nanotechnology uses machines as small as one atom at its smallest dimension. Radioactivity produces emissions that play havoc at the atomic level. Radioactively contaminating our raw materials can spell the end to nanotechnolgy for the US. Many manufacturing processes will be hard put to keep quality in the face of added radioactive burden in the raw materials and consumer goods.

Europe and Asia have the ability to monitor radioactivity. They have consumers and governments which avoid radioactivity. Some of this avoidance is related to the Chernobyl accident. When European and Asian consumers learn that the US is purposely loosing radioactivity into consumer goods, they will avoid our manufactures like the plague. I request that the NRC analyse the impact on manufacturing and markets for the scoping proposal: Controlling the disposition of solid materials.

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