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The Alliance For A Clean Environment
P.O. Box 3063
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July 8, 2003 (2:26PM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemaking and Adjudications Staff

Re: "Controlling the Disposition of Solid Materials"
Proposal to Recycle Radioactive Wastes Into Consumer Products!

Dear Secretary,

The Alliance For A Clean Environment is strongly opposed to recycling radioactive wastes into consumer products. We believe recycling radioactive wastes into consumer products will present an unnecessary synergistic, cumulative, and additive threat to human health. We believe there is no safe level of radiation to which people can be exposed, especially children.

By recycling these radioactive wastes, some people would be repeatedly and continuously exposed. Radioactive products would end up in landfills, such as the one in our community, the Pottstown Landfill. This is an example of what happens when radioactive wastes get into landfills.

Radioactive wastes have been dumped in the Pottstown Landfill since at least 1983. They have contaminated the entire mass of waste and are escaping into the community air and water, with Pottstown Landfill gas and leachate. Around the Pottstown Landfill there is an almost double leukemia rate compared to the entire state of PA. Since leukemia has been linked with low-level radiation, we believe this is a major factor.

Around the Pottstown Landfill, our childhood cancer rates has skyrocketed since the late 1980's, when it was 30% over the national average, to 60% over the national average in the early 1990's, to now 92.5 % over the national average in the late 1990's. Is this a coincidence? Not likely!

We believe that the radioactive gases, which escape in our air from the Pottstown Landfill are also a major factor in these shocking childhood cancer rates. VOC's and NOx are produced at a landfill, which in turn produce ground-level ozone. Ozone intensifies the cancer causing effects of radiation. Do we want this to happen around all landfills? By recycling radioactive wastes into consumer products, they will end up in massive amounts in landfills. Certainly, the Greater Pottstown Area can not afford this inevitable threat.

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Please do NOT:

- Release and recycle the nuclear industry's materials and wastes into the "free market" for reuse in consumer products, roadbeds, contaminated soils and sludge that could be spread on agricultural fields.
- "Dispose" of wastes by deregulating them so that we will receive many "small" doses of radiation -- just to save money for the nuclear industry -- or by dumping radwastes into hazardous waste landfills or even municipal landfills (e.g., Pottstown landfill -- **at a DEP-allowable 2 millirem per hour, whereas NRC proposes to allow initially a dose limit of only 1 millirem per year)**
- Redefine radioactive materials and wastes as "solid materials" by setting a standard that declares that radioactive materials aren't radioactive below their arbitrary annual dose limit of 1 millirem -- which no one will be able to calculate because the consumer products and other uses won't be monitored or labeled.
- Use this method of deception both to cut nuclear industry cleanup costs and to open the way for more radioactive wastes from new nuclear power reactors and new nuclear weapons.

We believe it is a grave injustice to people everywhere to recycle the nuclear industry's wastes into products. The only answer to nuclear waste is to stop making it. For the short term, we believe it is incumbent upon the nuclear industry to dispose of its waste in the safest possible way, regardless of the cost to this industry. The costs to the public for recycling nuclear wastes would be astronomical, both financially and physically. PLEASE consider the public in your decision. Do NOT allow the recycling of radioactive wastes.

Thank you for the opportunity to comment. We would appreciate notification of your decision, when it is finalized

Sincerely,

Lewis Cuthbert

Dr. Lewis Cuthbert
ACE President