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USNRC**

Secretary  
U.S. Nuclear Regulatory Commission (68 FR 09595)  
Washington, DC 20555  
Att: Rule-making and Adjudications Staff

July 15, 2003 (3:01PM)

**OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF**

This communication is in response to rule-making on disposition of solid materials potentially radioactively contaminated (Fed. Reg: 2/28/03 at page 9595).

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I am seriously concerned about any radioactive recycled materials, in this case, metals. I have observed that this and other related regulatory agencies have persistently ignored the facts of science in setting and approving safety standards which disregard the serious biological effects of low dose ingested and/or inhaled alpha and beta particles. Your standard-setting, based on ALARA (as low as reasonably achievable) has made it possible for you to abrogate your mission, which is the protection of workers and the public. If you had based your decisions on scientific evidence the nuclear weapons and power industry would have had to be ended and the accumulation of unmanageable wastes would not have led to this destructive decision to recycle.

Before going ahead with this outrageous proposal, I hope that you will take the time to review current independent studies on the effects on cells of ingested low-dose radiation, especially the alphas and betas and reconsider your decision to recycle radioactive metals. See ECRR, The 2003 Recommendations of the European Committee on Radiation Risk; Health Effects of Ionising Radiation Exposure at Low Doses for Radiation Protection Purposes, Regulators' Edition, Brussels, 2003, edited by Chris Busby, et al, Green Audit Pub., Aberystwyth, UK. In which you will find evidence that the official safety standards are far too lax.

I have a personal concern, one which may be affecting my community. Without the ability to discover the facts and do the epidemiology, it has to remain, for the time, anecdotal. I live in

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New Haven, a few scant miles from one of Connecticut's several Pratt and Whitney engine manufacturing plants in North Haven alongside the Quinnipiac River which flows down through New Haven. Over 100 Pratt and Whitney workers have died of a veery rare and fatal brain tumor, glioblastoma multiform. The widows of some of these victims have instituted a class-action suit against the company which includes, in the charges, radioactive contamination. Metal grinding, machining, etc. is a large part of the work. They have named their group "Worked to Death". The NRC should investigate the composition of these metals (as well as other procedures which may use radioactive materials), and examine the possibility that the river may be contaminated and that there may be effects on people in the community around the plant and down-river in New Haven.

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