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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Hello,

I am appalled that anyone would even consider recycling radioactive materials or materials that have been radioactively contaminated. We in the west have had too much radioactive contamination already, in some areas the underground water has been contaminated, there has been contamination carried by the wind, cows have been contaminated and our children have drunk contaminated milk, this is just a short list of the contamination in our environment.

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Please read the following article and reconsider the idea of recycling contaminated material. It may save money now, but will cause unimaginable costs and suffering in the future. Think of your children's grandchildren.

Thank you for your attention.

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Dumping On The Public

Karen Charman is an investigative journalist specializing in agriculture, health and the environment.

What would you think if you heard that radioactive materials from aging nuclear power plants and weapons complexes were going to be dumped in community landfills? Or that they would be "recycled" into everyday consumer goods, building materials, roads, playgrounds and more just to save those who created the waste the trouble and expense of keeping it isolated? That is exactly what the U.S. Nuclear Regulatory Commission (NRC) is considering -- despite the fact that the agency is statutorily required to protect the public's health and ensure our safety in regards to the nuclear materials it regulates.

The NRC has begun the process of writing rules that could allow across-the-board deregulation of so-called low-level radioactive materials from aging nuclear power plants, weapons complexes and other facilities the agency licenses. These rules will determine what will happen to the metals, concrete, soil, plastics, chemicals, glass, paper and other items that become radioactively contaminated at nuclear facilities.

Despite downplaying the risks of low level radiation exposure, the NRC Web site says "any increase in dose, no matter how small, results in an incremental increase in risk" for cancer and passing on birth defects. Further, radiation exposures are cumulative in the body, meaning that each exposure adds to the danger from previous exposures.

If unlabelled radioactive materials are released into our daily lives, there would be no way to figure out how much additional radiation anyone was actually exposed to. That is partly because NRC projections only consider the potential amount of radiation from one source at a time, not the combined amount from multiple sources which would exist in the real world. In September 2002, NRC commissioner Jeffrey Merrifield pointed out an additional problem: the "potential that the radioactive component may be concentrated in the recycling process or that the material will be recycled in a form resulting in more

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actual contact with the general public."

Nobody knows exactly how much of this material currently exists. The best estimates are on metals, which are said to account for the largest amount of radioactive material destined for recycling. The United States' 123 commercial nuclear power plants (some of which are already closed down) are expected to contribute 1.4 million to 2 million tons to the radioactive scrap metal heap. On top of that, over the next few decades more than a million tons of radioactive scrap metal are expected to be recovered from the nation's nuclear weapons facilities, according to a report by the Department of Energy (DOE), which runs those sites.

Currently, the NRC allows "slightly radioactive" materials to be released on a case-by-case basis. But the agency has been pushing to standardize the practice, and it has proposed four other options. The first would establish acceptable levels of radioactive contamination that would allow materials below that threshold to be released without any restrictions. Under the second option, the materials would be restricted to certain industrial uses. Option number three would allow the material to go to hazardous waste facilities that are not designed to handle radioactive materials. The fourth option would restrict this material to radioactive waste dumps.

If this material is deregulated for unrestricted use... it will be everywhere -- unlabeled and unmonitored.

If this material is deregulated for unrestricted use, as the industry hopes, it will end up in everything from our knives and forks, zippers, the braces on our kids' teeth -- even artificial hip joints and IUDs -- to gardening tools, potting soil, building materials, furniture, computer equipment, and children's toys. In other words, it will be everywhere -- unlabeled and unmonitored.

Environmental groups, the metal industry and the steelworkers union vehemently oppose unrestricted release. But it remains to be seen whether the steel industry, the environmental community or the public can stop the nuclear establishment from dumping this portion of its waste into general commerce. The safest option is to keep it isolated in facilities licensed to deal with radioactive waste, and phase out nuclear power and weapons, which only create more.

But the Bush administration is aggressively promoting both new nuclear power plants and weapons, while both the DOE and the NRC are looking at ways to cut costs. And as recently departed NRC chairman Richard Meserve observed, recycling the waste is definitely a lot cheaper for the nuclear waste generators. In January 2001, Environment News Service reported him saying that releasing contaminated solid waste materials into everyday commerce is necessary to ensure the continued viability of both the nuclear power industry and the DOE's clean-ups of its highly contaminated weapons complexes.

In 1986 and again in 1990, the environmental community blocked NRC's attempts to deregulate radioactively contaminated materials for unrestricted recycling, but now it may be a lot harder to stop. Other countries face mountains of nuclear garbage, and the European Commission and the U.N.'s International Atomic Energy Agency have already set permissive recycling standards. International transport regulations have also been amended to allow the free flow of unlabeled radioactive scrap and products made from it, and the U.S. Department of Transportation is now looking at doing the same.

But it's not a done deal yet. The dangerous and irresponsible dumping of radioactive waste into our daily lives is not inevitable. Raise hell -- in the media, with the NRC and your federal, state and local representatives -- to permanently prohibit it. Time is short.