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To: OWFN_DO.owf5_po(CHAIRMAN)
Date: Thu, Sep 30, 1999 12:29 PM
Subject: radioactive metal recycling

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USNRC
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Dear NRC, attached is a letter urging you to not allow the recycling of low level radioactive waste metals into the loop for use by the general public.
thank you for your attention. Joshua Gordon

OFFICE OF
RULEMAKING
ADJUDICATION
IAFF

DOCKET NUMBER
PROPOSED RULE **PR** 20
(64FR35090)

Template= SECY-067

Acknowledged by card OCT - 7 1999

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Dear Sir-----

This is a letter to urge you to do everything you can to prohibit the release of radioactive metals into the recycling loop for general manufacturing use.

The proposal is ill conceived, and will result in world health, environmental, and economic catastrophe. **This is not a solution that does away with the problem of disposal. It just shifts it from those who can afford it, to those who can't.** The release of low level radioactive waste metal into the loop for recycling is not a safe or responsible way to deal with it. Dilution is not the solution to pollution, in this case. Everyone in the industry has known from the beginning that the use of radioactive materials is inherently dangerous, and that dealing safely with the waste would be a real problem. The companies that have produced this waste are the ones that must take responsibility for the permanent disposal of it. **The best and least expensive time to collect, sort, and deal with the stuff is now, at the source, not once it has been mixed into the environment and spread all over the planet.** These companies have had their party, and although it wasn't as much fun as they had hoped, it has been fun enough. Now it is time to pay the piper. **The only ones who will benefit by recycling radioactive waste into consumer goods are the companies and shareholders who otherwise would have to foot the bill for proper disposal. No one else will benefit.** That's a tiny minority living large at the expense of a vast majority, and it is not justifiable in any sense.

Mixing radioactive metals with others in consumer destined products would:

1) Surround the people of the world with an unnecessary source of radiation. It is unnecessary because we have an option to dilution. An effort at permanent proper disposal is expensive, yes, but it is the right thing to do. *We have developed a site for safe disposal, the stuff belongs there.*

2) Pass on the burden of ultimate disposal to local municipalities. This is not a solution that does away with the problem of disposal. It just shifts it from those who can afford it, to those who can't. Eventually, the bill for proper disposal will have to be paid. No company is crying that proper disposal will put them out of business, just that it will be expensive. *It would be far less expensive for the government to right now underwrite disposal and bail out the industry, (If indeed it needs bailing), than to deal with this later.* **Not until 100% of all metals in the world are recycled all the time, would anyone be able to make the claim that none of this material would eventually end up in landfills, illegal dumps, and by the side of the road, not just in the US, but throughout the world.** Eventually, the cost of this disposal would ruin towns, require huge governmental support, and pose an

incredible technological challenge to separate and purify material. In the meantime, the material itself would poison water sources and ecosystems throughout the world. We might never recover from this decision, just as we might never recover from the decision to create the stuff in the first place.

3) Create a cumulative effect that would be a sinister, far reaching, significant health risk We have enough sources of radiation without consciously adding to it. The example given by the industry proposition of one metal desk exposing a worker, to make it personal, You, for example, to the equivalent of one extra chest x-ray a year, is misleading. This sounds benign, until you add that to the effect of your recycled car, your recycled toaster, your silverware, your house wiring, nails and studs, your paper clips, the fancy pen you like to keep in your shirt pocket next to your heart, and on and on. *Given the track record of the nuclear industry, we can expect abuses of safety limits.* How is anyone going to be able to track the plant, and batch of "over the limit" metal? The impetus to cheat is clear. What will be the recourse of the common person, when s/he finds out that the baby's crib exceeds the "allowable limit" by two or three hundred percent? Will the government end up suing the nuclear industry after the fact, just as it's suing the tobacco industry? Why start this cycle when we don't have to? How many more years do you expect to live? The cumulative exposure is far greater than what we are being led to believe. Would you choose to do that to yourself, just to save the profit margin of a few utility companies? Once your grandchildren get leukemia, and you are dying from a non-specific mystery disease, you'll understand, but then it will be too late.

4) Ultimately increase pressure on production for "pure untainted " metal. All too soon, no one will want anything to do with anything made from any recycled metal. Informed people will regard any recycled metal product with suspicion. It might be radioactive. Just as the "organic" food industry has really started to take a market share throughout the world, the public will reject this metal on a large scale. (Unless its sold at below market value to unknowing, poor populations. But we wouldn't do that, we'd only produce for sale in the US, right? There aren't any poor folks living near you that would bring this stuff into your neighborhood, are there?) The world will start to demand metal made from virgin materials. Just as the food industry giants would love to change the definition of " organic" to get into the market with minimal cost, the nuclear industry is attempting to change the definition of "low level waste". The pressure to mine and use our limited natural resources will ruin any hope to preserve our reserves, and the land that they happen to be buried in.

5) Put a lot of companies that handle recycled metals in the position of great expenditures to protect their workers. From collectors, to smelters, to truckers. Everyone surrounded by more than "one metal desk" will need to change the way they operate. Look at the expenses of facilities that already handle low level waste in this country. *The industry's health assurances are misleading. Instead of protecting the people, it is attempting to change the allowable limits. The risks will increase, not decrease.*

6)The implications are that the entire us economy might easily be affected. It would only take one or two major trade partners to reject anything metal produced by the US to set our national economy into a downward spiral. Good luck trying to sell radioactive products openly to the British, Germans, or Canadians.

Clearly, this is not the way we want the world to go. From the beginning, we have been deliberately deceived, lied to, manipulated, and some even murdered, by those who have lost sight of their primary mission to protect our safety. As a result of public outcry, special government oversight agencies have had to be created to try to stem the safety breaches of an industry that has demonstrated time and time again, that it cannot be trusted with the "moral dilemma" of profit vs. safety.

The principal tenant has shifted from "no risk", to "an acceptable risk". Instead of safety, the solvency of a company or three, and the profits of an industry, have become the motivating principle behind policy decisions.

I ask you, is it necessary to release hundreds of thousands of tons of radioactive metals into the environment? **The answer is clearly NO. Please do your utmost to stop the recycling of radioactive materials into the market for consumer goods. The stuff needs to be isolated and disposed of properly.**

Thank you for your attention.

Sincerely, Joshua Gordon