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August 6, 1976

The Honorable Marcus Rowden
Chairman
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Rowden:

The Natural Resources Defense Council, Inc. has been concerned for some time with radioactive wastes generated in the uranium fuel cycle. At various times in the past, NRDC has requested NRC to undertake environmental analyses of a number of problems associated with waste disposal.

To date, insufficient attention has been paid to the environmental dangers posed by the currently licensed method of disposing of "low-level" wastes at commercial burial grounds. The inadequacies of current practices and the lack of information critical to the development and administration of an effective and adequately safe waste disposal program have been documented by many sources.

Based on the information that has now been developed and the studies conducted by, among others, the General Accounting Office, the U.S. Environmental Protection Agency, the U.S. Geological Survey, and the House Government Operations Committee, a complete evaluation of the Nuclear Regulatory Commission's program for disposing of low-level wastes is plainly appropriate and required.

This letter, therefore, requests the Commission to prepare an environmental impact statement pursuant to the National Environmental Policy Act analyzing the environmental impact of the Commission's low-level waste disposal program and all reasonable alternatives to it.

NRDC firmly believes that this statement is long overdue and is required under the National Environmental Policy Act. We enclose a memorandum of points and authorities which sets out at greater length our view of the evidence and the legal authority requiring NRC to prepare this impact statement as soon as possible.

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Enclosure 1

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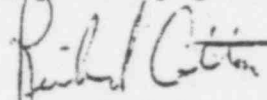
The Honorable Marcus Rowden
August 6, 1976
Page 2

NRDC is also submitting to the Secretary of the Commission a petition for interim regulations which NRDC believes are required immediately to protect the public health and safety pending the outcome of a fuller Commission investigation of its low-level waste disposal program.

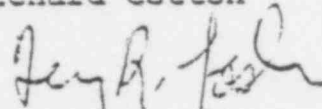
Our request for an impact statement is, however, in no way dependent upon the outcome of Commission action on the petition. We therefore request a prompt response from the Commission as to whether it will prepare an impact statement.

We look forward to your early response in this important matter.

Very truly yours,



Richard Cotton



Terry R. Lash

RC/TRL/ak
Enclosure

cc: All Commissioners

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