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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Docketing and Service Branch

Dear Mr. Secretary:



Allowing radioactive wastes burial under 20 CFR 20.101 may pose a danger to the environment and to public health. North Carolina, as an agreement state, under 20 CFR 20.101, permits a licensee to handle dangerous levels of radioactive wastes.

A radioactive waste storage facility, Watts Retreat Farm, at Parnesseville, Wilkes County, North Carolina, was licensed under state regulation (20 CFR 20.101) which is practically identical to the Federal regulation 20.101.

This facility was constructed in total secrecy and was in operation several months before local residents became aware of its purpose. Bales of hay were stacked at the drive leading into the facility to obscure it from view. A member of the Watts family, in a conversation with citizens that it was a medical facility. Members of the Parnesseville and Parnesseville Community near the Watts Retreat making deliveries to the "Retreat" in the early hours before daybreak.

Acknowledged by card... 2/5

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The Watts Retreat Farm has the likelihood of becoming a popular dump for wastes possibly for use in chemical processing activities such as the reclaiming of toluene. This question was asked of Finley Watts Sr. by Dr. James Campbell, a physicist and former resident of Wilkes County in the office of Judge Julius A. Rousseau. Dr. Watts did not deny that this might indeed be his intentions. This nuclear waste facility is within 100 feet of a tributary of the Yadkin River which is the drinking water supply for Winston Salem.

Section 20.304 is totally inadequate for the protection of the public. A licensee can bury wastes on privately owned property and is not required to demonstrate that surface water flow patterns and soil properties are suitable for safe burial of radioactive wastes. Applicants for radioactive waste processing or disposal facilities should analyze all pertinent environmental factors and perform safety analyses to show that the proposed operation would be acceptably safe. As the Watts Retreat Farm is privately owned property, it may change hands at any time and thus may not be perpetually maintained.

