

SIERRA CLUB



LONE STAR CHAPTER

November 21, 1979



Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attention: Docketing and Service Branch

To Whom It May Concern:

Please accept this letter as a formal notice of the intent of the Lone Star Chapter of the Sierra Club to participate as a "full participant" in the Nuclear Regulatory Commission's generic proceeding to reassess its degree of confidence in the safe disposal of radioactive wastes produced by nuclear facilities. We apologize for the lateness of our notice, but our group was not informed of the NRC's notice of proposed rulemaking until a few days ago.

The Lone Star Chapter is very much interested in the issue of nuclear waste disposal. Our organization's geographic jurisdiction within the national Sierra Club encompasses almost the entire state of Texas (with the exception of the El Paso area in the far-west region of the state), and a number of areas within that jurisdiction are now being considered by the U. S. government as possible sites for disposal of radioactive wastes. A number of our members have been active in monitoring and providing public input to the government's consideration of these specific sites and its consideration of the general issues involved in nuclear waste disposal. Moreover, the Lone Star Chapter during the 1979 session of the Texas Legislature took an active part in defeating what our organization felt to be an unwise and inadequate State regulatory program proposed for licensing "low level" nuclear waste disposal sites in Texas. Our opposition was not necessarily to the concept of any nuclear waste disposal in Texas but rather a concern about the particular regulatory process outlined in the proposed legislation.

The Lone Star Chapter is currently formulating and/or re-examining its positions with regard to nuclear waste disposal issues (which will be guided by appropriate national Sierra Club policies in this matter which are also in a state of formulation and re-examination). Thus, at this time, our organization cannot provide the NRC with a precise statement of our positions on all nuclear waste disposal issues. We can indicate our concern, however, that the U. S. government has not demonstrated to our satisfaction that radioactive wastes from nuclear facilities will

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"When we try to pick out anything by itself, we find it hitched to everything else in the universe." John Muir

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be stored or disposed of in sites away from those facilities in a manner which will adequately protect man and his environment. We are especially concerned about the use of salt as a geologic medium for the storage of radioactive wastes. However, the Lone Star Chapter would look forward to a full airing of its concerns (and those of others) and of all counter-viewpoints in an effort to resolve these issues.

Within our organization we have a number of members who have studied and followed the nuclear waste disposal issues from the perspective of concerned citizens but we also have members with legal, technical (for example, geologic), and economic expertise in matters related to these issues. We feel that our members, working through our organization as a participant in the NRC proceedings, will contribute to the gathering of a wide range of viewpoints and a more comprehensive body of knowledge on nuclear waste disposal.

We look forward to hearing from you as soon as possible concerning further steps in the NRC generic proceedings. Thank you for reviewing our notice of intent.

Very truly yours,

Ken Kramer

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