

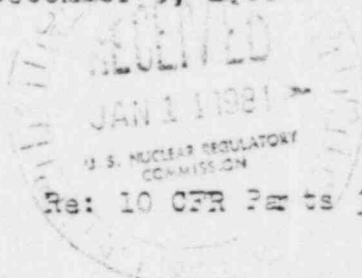
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FRIENDS OF THE EARTH

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December 9, 1980



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

Attention: Docketing & Service Branch

Re: 10 CFR Parts 30, 32, 70, 150

Dear Sirs:

We strenuously object to the proposed exemption of Technetium-99 and low-enriched uranium from licensing and regulation by the NRC.

We are astounded that this was published for comment without scheduling a public hearing and urge that you convene such a hearing at the earliest possible moment.

The proposed amendment, if adopted, would circumvent the dose limits established by the U.S. Environmental Protection Agency for members of the public from the nuclear fuel cycle, now set at 25 millirems per year per person. The materials, contaminated as part of the commercial nuclear fuel enrichment program, are undeniably components of the fuel cycle; moreover, the "dilution" of their radioactivity by permitting smelting with non-radioactive metals and incorporation into consumer products, constitutes an unauthorized untested method of low-level waste disposal, dose limits for which have not yet been set.

We are aware that there are proceedings under way regarding the "confidence" in permanent radioactive waste disposal methods. As of this date, no accepted, licensed and promulgated method for waste disposal, high- or low-level, exists; before it does, there will have to be opportunity for full public participation, including, as mandated by the National Environmental Policy Act, discussion of alternatives to the proposed action. Your proposal to permit the dispersion of radioactive metals from the nuclear fuel cycle thus circumvents legal and administrative procedures set down in Federal law; in effect, the NRC would be permitting a specified low-level waste technique before technical analysis, public participation, and NEPA and waste confidence proceedings had been satisfactorily completed.

Until the above proposal regarding radioactive metals, as well as the Three Mile Island II plant clean up problem, is incorporated into the waste confidence proceedings, there will be zero confidence in your Commission's will or ability to face up to the waste problem. Or is the above proposed rule an admission that there is no solution?

Sincerely,
Lorna Salzman
Lorna Salzman
Mid-Atlantic Rep., FOE

cc: US. EPA Office of
Radiation Programs

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