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December 8, 1980

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Secretary of the Commission
U.S. NUCLEAR REGULATORY COMMISSION
Washington, D.C. 29555

Attention: Docketing and Service Branch



Dear Sir:

Please be advised that I am strongly opposed to proposed rule number 10 CFR Parts 30, 32, 70 and 150 pertaining to the "exemption of technetium-99 and low-enriched uranium as residual contamination in smelted alloys."

The minimal dosages indicated in themselves might appear harmless; however, it would seem apparent that added to the levels of radiation the people coming in contact with the smelting or by-products of this scrap are already (or may in the future be) subjected to, the cumulative effects could well be excessive. The health risk certainly does not justify the stated economic benefits.

This action is also unjustified and impractical in strictly monetary terms. A prime example is the volume of legal suits being brought against the Federal Government because of the thoughtlessness, carelessness, secrecy and above all lack of knowledge of the AEC during the atomic tests of the 1950's. Today's dollar benefits from "recycling contaminated metal scrap into salable smelted alloys" could be paid out many times over in future claims and legal expenses.

Sincerely,


Charles M. Silverman

cc: Hon. John H. Chafee, U.S. Senator
Hon. Claiborne Pell, U.S. Senator



-41, 230