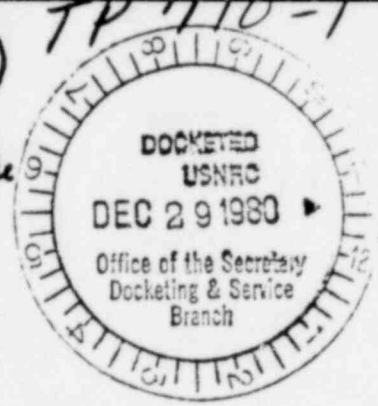


TERA (12) TP 710-1

SEA/NY,
Safe Energy Alliance of New York
160 Claremont Avenue
New York, New York 10027

DOCKET NUMBER PR *misc notice*
PROPOSED RULE *Nu Reg 0518*



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DOCKET NUMBER ~~PR-50, 52, 70, 150~~
PROPOSED RULE (~~45 CFR 70374~~)
~~SMELTED 11/20/80~~

December 20, 1980

(Re: Draft Environmental Statement, NUREG- 0518)

Nuclear Regulatory Commission
Washington, D.C. 20555
Chairman John Ahearne

Dear Mr. Ahearne:

We are writing in regard to the proposed regulation to 1.) deregulate certain medical and research wastes and permit their disposal in sewage systems and sanitary landfills and 2.) recycle metals contaminated with technetium 99 and low-enriched uranium into consumer goods such as cars, furniture, toys, cooking utensils, appliances, machinery and construction materials.

The Safe Energy Alliance of New York is unequivocally opposed to further contamination of the environment. To date, no studies have been done which prove that continuing and accumulative public exposure to low-level ionizing radiation has no long-term adverse health effects. In the absence of such proof, protection of the public health and safety of the American people must be the Commission's first priority.

Studies by Alice Stewart, M.D. in the United Kingdom, showed that exposure of the fetus in utero to low-level radiation is teratogenic. Subsequent public health regulations as a result of Dr. Stewart's work require that xray for pregnant women be severely limited.

Thomas Mancuso, M.D.'s findings of studies done on workers in Hanford, Washington, also show that long term exposure to low-level radiation is not only carcinogenic but also causes an increase in the incidence of heart disease and other debilitating and life-threatening diseases.

The Safe Energy Alliance of New York also views the proposed regulation as an abdication of responsibility toward public health and safety. Such a policy as the one proposed is in clear violation of the mandate of the Atomic Energy Act to protect the public health and safety, and the requirements of the National Environmental Policy Act.

In view of organized crime's increasing role in the disposal of toxic wastes in the states of New Jersey, Massachusetts and in New York, it would appear that deregulation of low-level radiation could open up the

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whole field of low-level radioactive wastes to organized crime. Has full consideration been given by the Commission to this prospect?

Yours truly,

Barbara Charles

Ms. Barbara Charles,
Co-Chairperson, SEA/NY