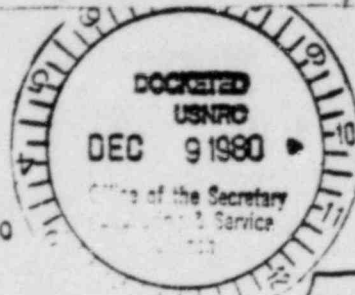


TP 710-1



001485

DOCKET NUMBER PR-30, 32, 70, 130
PROPOSED RULE (48 FR 70874)
SMELTED ALLOYS

F. Adam McGovern
The Plainfield Area Safe Energy Alternatives Alliance
P.O. Box 8, Plainfield, N.J. 0706

Gentlemen:

It has come to my attention that the NRC is considering amending its regulations to exempt from licensing and regulatory requirements any person who receives, possesses, uses, or transfers Tc-99 or low-enriched uranium in any smelted alloy or material containing such alloy. The purpose of this move is to avoid radioactive waste burial costs, gain a net benefit of \$91.6 million, and remove the obstacles which have existed to the trade in CIP-CUP-contaminated scrap, which can then go on to be used in myriad products such as automobiles, appliances, furniture, utensils, personal items and coins.

I am writing to register my opposition to such amendments of NRC regulations. It is to me unthinkable to run the risks involved in actually releasing such contaminants into objects of everyday use. I see no advantage in putting Tc-99 and low-enriched uranium into the hands of the public, to brave a legacy of adverse health effects, for the sake of short-

term benefit:

The proposed amendments would avoid burial costs for the material, but this would only take some of the contaminants this country's nuclear industry produces annually off the hands of the facilities which must store and bury them. But this relatively minor alleviation could have serious consequences for those who would subsequently buy the contaminated products. This would only be a way of sweeping part of the problem under the rug, as it were. There is no permanent solution to the waste disposal problem yet anyway, and the problem of segregating the contaminants from the public won't be ameliorated by dispersing some of them into public use.

An AEC market survey of the early 1970's is quoted in the NRC news release announcing the proposed amendments as basis for the statement that the existing requirement has stifled trade in contaminated metal scrap. I should hope that trade in materials hazardous to the public is stifled. I believe that the accommodation of such trade would be contrary to the functions of an agency which exists to protect the interests of the public, and which has

a record of doing so.

Consequently, I believe that your agency would naturally forgo consideration of letting uncontrolled metal into the marketplace for a \$91.6 million benefit, or almost inconsequential savings in this age of multi-billion dollar budgets at any rate.

Also to be considered are the possible future financial risks of the proposed action. If in the future the need arises for decontamination and recall of products and for legal settlements with adversely affected individuals and groups, the administrative costs could far outweigh the \$91.6 million saving. Years after radioactive uranium tailings were used in all manner of building materials, in golf courses, and in playgrounds as a quick solution to disposal and amortization of the material, a serious health problem has surfaced in the areas affected. We know better now. We have our past mistakes with uranium tailings to guide us in preventing such experiences from recurring. We are now able to see past monetary benefit and deceptively reassuring lack of health effects in the immediate future. We

can prevent the infliction of that kind of hazard on the American people and that kind of burden on your agency if present regulations are left standing. I trust you to make the right decision.

With respect and concern,

T. Adam McGovern
for the Plainfield Area SEA Alliance

P.S. I have registered my opinion on the proposed amendments within the time period specified (October 27 - December 12). It is true, however, that the timing of this announcement coincides with holiday preparations and will thus receive less attention than it regularly would. I would thus suggest that an extension of the public comment period for as long as you deem reasonable might be in order.

T.A.M.