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OFFICE OF SECRETARY
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Dear Secretary,

Thank you for the opportunity to respond with my comments on the "Radiological Criteria for Decommissioning of NRC-Licensed Facilities." There are many issues that could be raised concerning decommissioning. I am only addressing a few of these issues.

Primarily, I cannot understand why the NRC would continue to issue licenses with the state of the environment as it is in regard to nuclear waste. A major concern of decommissioning is what to do with the waste. We have no idea what to do about any waste, be it high or low-level. Why are we still generating more? It is absurd to continue with this lie, that we will one day have an answer. We have painted ourselves into a corner.

Next, I have a problem accepting the concept of ALARA. As Low As Reasonably Achievable is an option for the licensee to cop out. Basically, all the licensee has to say is they can't complete decommissioning, and they're off the hook.

One of the reasons for not being able to complete the work is money. The licensee went into the situation to make money. Where is this money? Why is the taxpayer always to foot the bill? I'm a taxpayer; I'm sick of picking up the tab for someone who has made money, but is backing out of his responsibilities.

I also have great cause for concern about the standards established. Sometimes 3 mrem/yr is put out, then 15 mrem/yr, the 100 mrem/yr. What determines this? The amount of money involved? What about less than 3 mrem/yr? I find the statistics game unacceptable. Anything can be proven with statistics.

It's stated that NRC and AEC regulations in the past have protected workers and the public. I have to take issue with that statement. Later it is stated that DOE practices have protected the public. That's another concept I don't accept.

The problem of decommissioning is part of a larger problem. On a national and international level, we need to get serious about facing reality. We need to clearly define radioisotopes and what makes them high or low level waste. We need to discuss radioactivity and half-lives, then daughter elements and their radioactivity and half-lives. When all this is thought through, we need to determine what is high and low level. When logical definitions are established, they need to be implemented. As far as storage, what are we to do? Cladding is continually being breached. Amounts are incomprehensible. Which leads back to my original statement, why are we still creating more waste?

We need to plan for the long term which includes funding from the licensees. The selfish greed of a few are impairing the future health and financial stability of us all.

Thank you for your time,

Carol Cain

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