ADSULTE: AMB SERDAM - ANCHORAGE - AUCKLAND - BOSTON - BRUSSELS - BUENOS AIRES - UNICAGO - COPENHAGEN - DUBLIN

FORT LAUDERDALE - GOTHENBERD - HAMBURG - LEWES — U.K. + LONDON - LUXE - BOUND - MADRID - MONTREAL - DBLO - PALMA DE MALLORCA

FORT LAUDERDALE - GOTHENBERD - HAMBURG - COSTA RICA - BEATTLE - BTOCKHOLM - BY DNST - SURRETO - VANCOUVER - VIENNA

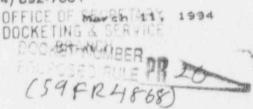
PARIS - ROME - BAN FRANCISCO - SAN JOSE -- COSTA RICA - BEATTLE - BTOCKHOLM - BY DNST - SURRETO - VANCOUVER - VIENNA

WASHINGTON - WORLD PARK BASE -- ANTARCTICA - ZURICM

GREENPEACE 58

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To: The Secretary of the Commission U.S. Nuclear Regulatory Commission Washington, D.C. 20555 From: Rod McCoy 20 Thirteenth St. Atlanta, Ga. 30309



Dear Commissioners,

I want to thank the commission for the opportunity to

I want to thank the commission for the opportunity to

participate in the process of developing this rule and to

encourage fuller participation in future processes. I realize

there are a number of interests to consider in this task. " will

keep my comments here brief and to the point by avoiding

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panel in Atlanta.

Fission by-products which have been generated by human fission by-products which have been generated by human action are unnocessary forms of pollution to the bio-sphere. The particular affects of these forms of pollutants is little

understood or agreed upon. Many are virtually permanent hazards.

By establishing a decommissioning standard which terminates
licenses liability the NRC is preparing to shift all financial
and other burdens for future FREDICTABLE health effects onto the
public. In a time when the nation is moving toward insuring
public. In a time when the NRC is shifting the
health care to all citizens the NRC is shifting the
health care to all citizens the NRC is shifting the
taxpayer where there is currently a known causal agent, the
taxpayer where there is currently a known causal agent, the
generators of these wastes. This practice further releases a
generators to open new operations with similar associated hazards
on another site.

This last point along with the planned transportation of these wastes from contaminated facilities to other previously uncontaminated sites for containment while releasing property acknowledged as bearing residual radioactive contamination to acknowledged as bearing residual radioactive contamination to unrestricted use, contribute to a ruling which merely unrestricted use, contribute to a ruling which merely unrestricted the hazards associated with the use of radionuclides to industry.

The commission consistently acknowledges the complexity and uncertainty of the "decontamination" process throughout the proposed rule . The "flexibility" of its proposed standard complicates the issue further.

This rule as proposed contributes to the illusion that these facilities and their wastes are acceptable and even inevitable.

In conclusion this rule cannot be considered to adequately protect the public welfare. My position continues to be that the commission must first propose to end the production of any man-made radioactive wastes before any standard for decommissioning can be considered complete.

Stranta, a.

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