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November 24, 1999

NRC Chairman Richard Meserve  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Rulemaking and Adjudications Staff

Re: Radioactive Household Items and Atomic "Recycling"

Dear Mr. Meserve:

I am writing to ask the Nuclear Regulatory Commission to isolate, at any level, radioactive wastes and materials from the public and the environment.

Using radioactive wastes in consumer products poses unnecessary, avoidable, involuntary, uninformed risks to consumers and producers.

It is not credible to believe that computer models can calculate and accurately predict any or ALL of the doses to the public and environment from all the potential radioactivity that could be released over time. Projections of "acceptable" or "reasonable" risks from any amount of contamination being released are meaningless and provide no assurance. Monitoring for the specific types and forms of radioactivity that could get out, cannot only be very expensive and tricky to perform, hot spots can potentially sneak through. The public cannot trust the nuclear generators to monitor their own releases. A prime example is the newly closed Brookhaven National Laboratory, located in Brookhaven, New York. Another example is the Millstone Nuclear Power Plant in Connecticut, the most heavily fined power plant in the nation.

No matter what level the NRC sets for allowable radiation risk, dose or concentration, it will be almost impossible to measure, verify and enforce. Who is liable if the "legal" standards NRC intends to set are violated? For decades, the public has clearly opposed releasing radioactive materials into commerce.

Naturally occurring background radiation cannot be avoided but its presence in no way justifies additional, unnecessary, involuntary radiation exposure, even if those exposures might be equal to or less than background. Nor does it justify shifting the economic liability from the generators or radioactive wastes and materials to the economic and health liability of the recycling industries, the public and the environment. The fact that radioactive waste is already getting out should not be used to justify additional legal levels. The NRC, EPA and DOE should prevent future and correct past releases. The fact that other countries are releasing radioactive materials into the marketplace is no excuse for us to legalize it. The United States should take the lead in preventing any further contamination of the international marketplace. We best protect ourselves by not facilitating international radioactive commerce.

We fully support the complete opposition and "zero tolerance" policies of the metal and recycling industries, the management and the unions. We appreciate their efforts, not only in their opposition to legalization of radioactive releases, but also in their investment in detection equipment and literally holding the line against the radioactive threat to the public. They should not have to be our de-facto protectors. The NRC, DOE and EPA must act to prevent the dissemination of radioactive wastes in recycled materials and general commerce. The problems experienced by the steel recycling industry with "generally-licensed sealed sources" getting into their facilities and costing tens of million of dollars to clean up should serve as a warning not to let any other radioactive wastes and materials out of the regulatory control.

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The NRC should also extend the comment period on releasing radioactive waste into commerce until at least September 2000 for a full public debate.

Very truly yours,



Ron Delsener

RD/dmm