

Sierra Club
Ohio Chapter Energy Committee
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OFFICE OF THE STATE
RULEMAKING AND
ADJUDICATION STAFF

November 23, 1999

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

DOCKET NUMBER
PROPOSED RULE PR 20
(64FR35090)

Attention: Rulemaking and Adjudications Staff

Dear Mr. Meserve:

I am writing to oppose the redefinition of radioactive waste materials that in any way permits the introduction of these wastes into the public domain. The NRC and the industry have fully established that the nature of these wastes are such that they cannot be adequately controlled, and redefining any portion of radioactive waste in any way will inevitably result in harmful levels of waste being placed in the public environment.

Several years ago, a Cincinnati-area steel mill lost eight months of operation, and millions of dollars when a load of recycled radioactive material was discovered in a steel furnace. Not too long before that, an Atlanta food irradiation project was discovered to have been leaking Cesium for over six months, and workers had carried the highly dangerous radioactive material into their cars, their homes, and elsewhere without knowing that they were doing so.

These things occurred prior to any loosening of definition. We have also seen the chaotic failure of reasonable control at the Fernald plant, and are waiting for the far worse examples of mismanagement that will surface whenever the truth about the Piketon facility starts to come out. Nuclear materials appear to require a degree of responsibility that is not possible with human engineering systems. You should recognize that, and begin to end the production of these sorts of waste immediately, rather than pretend that there is an enforceable safe threshold.

To reiterate the level of concern we share with other parties to this matter, we still do not want nuclear power and weapons wastes "released," "cleared," deregulated, exempted, generally licensed,

designated "de minimis," "unimportant," or BRC-below regulatory concern, or by any other creative, direct or deceptive means, allowed out of nuclear facilities and into the marketplace or the environment, at any level.

I don't think I need to go into much more detail here. On behalf of the eleven million people in Ohio, and the 14,000 members of my organization, I urge you to do what is right for our descendants.

Sincerely,

A handwritten signature in cursive script that reads "Ned Ford".

Ned Ford
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