December 7, 1999

## PROPOSED RULE PR 20 (64FR35090)



(179)

Dear Secretary Meserve,

99 DEC-8 P4:09

I am writing to ask the Nuclear Regulatory Commission not to yield to ridiculous requests to isolate radioactive wastes and materials and anything they contaminate, no matter what level. Radioactive materials are naturally occurring, and we are bathed in radiation every moment of our existence - from before birth until we die. The hazards associated with such materials are among the most-studied and best understood risks faced by members of modern society. It is nonsense to insist that "the legacy of atomic weapons and energy production" should be isolated from the public and the environment.

The NRC should not unduly extend the comment period on this issue. American consumers should be educated on the miniscule risks associated with exposure to radioactive household items—risks that, under a sound regulatory approach to recycling, will be "lost in the noise" of natural background radiation.

Largely due to a lack of such an educational effort, the public has, in the past, spoken out of misplaced fear & anxiety, and some individuals have become irrationally emotional on this issue. Some still do not want what they consider to be nuclear power and weapons wastes "released," "cleared," deregulated, exempted, etc., even though they openly embrace the idea of recycled cans, newspapers and bottles which, ironically, could easily be similarly stigmatized, for example, as "potentially biohazardous wastes." In fact, those same household wastes contain traces of radioactive material, both naturally occurring and "manmade" so we are in essence already doing the exact thing that some ill-informed members of the public believe they're trying to prevent.

The current methods of releasing radioactive wastes from commercial licensees and weapons facilities are well developed and technically sound. No attempts need be made to recapture that which has already been released to do so would be folly, and an unjustifiable expense by any standard.

Using radioactive wastes in consumer products does not necessarily pose unnecessary, avoidable, involuntary, or uninformed risks. The scientific capability exists to ensure that the risks are controlled to an acceptable level, and should be used to do so.

The public has, whether due to ignorance or misconceptions, opposed releasing radioactive materials into commerce. It's time that we stopped letting the science of risk analysis be overrun by irrational fear.

Naturally occurring background radiation cannot be avoided but its presence in no way justifies additional, unnecessary expenditures of money in an effort to control every atom of radioactive material that was ever isolated from natural source material or created by technological enhancement.

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Complete opposition and "zero tolerance" policies are clearly unworkable which suggests that they're simply political ploys.

The fact that other countries are releasing radioactive materials into the marketplace is an indication that not only is development of a sound technical basis feasible, but that we're lagging in that area.

The United States should take the lead in establishing standards for the international marketplace. We protect ourselves best by developing a sound scientific basis for facilitating international radioactive commerce.

The fact that it is difficult and expensive to monitor and detect radiation does not justify conceding to the demands of those who have an irrational fear of all things radioactive. If anything, since society has already assumed the burden of monitoring at a level below which any meaningful risk exists, it's all the more reason to educate the public, develop a sound methodology for determining which items are suitable for release, and to move ahead.

In conclusion, the NRC should serve the interests of the public through educational efforts and by development of a reasonable method to release appropriate radioactive materials into commerce.

Very truly yours,

Richard Boyer 231 Old Stone House Road Carlisle PA 17013