

From: Jennifer Mathews <syncdog@yahoo.com>
To: OWFN_DO.owf5_po(AVC)
Date: Fri, Dec 10, 1999 11:46 AM
Subject: radioactive wastes

11/10/99

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Dear Chairman Meserve:> > I am writing to call on the
Nuclear Regulatory
> Commission to isolate> radioactive wastes and
materials and anything they
> contaminate, no> matter what level. The radioactive
legacy of atomic
> energy and weapons> production should be isolated
from the public and
> the environment.> > The NRC should also extend the
comment period on
> releasing radioactive> waste into commerce to at
least September 2000. This
> issue is too> important to act hastily upon and it
should be fully
> debated by the> public. The public has spoken
repeatedly before on
> this issue and needs> time to be informed that
subject is open again or
> still.> > NO MORE RADIOACTIVE RELEASES
> We still do not want nuclear power and weapons>
wastes "released,"
> "cleared," deregulated, exempted, generally>
licensed, designated "de
> minimis," "unimportant," "trivial" 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.>
> TRACK AND RECAPTURE ALREADY-RELEASED RADIOACTIVE>
WASTES
> The current methods of releasing radioactive wastes>
from commercial
> licensees and weapons facilities must immediately>
cease. No future
> radioactive releases should be permitted and a full>
accounting and
> recapture of that which has already been released>
should commence.>
> PREVENT AVOIDABLE RADIATION EXPOSURES and RISKS
> Using radioactive wastes in consumer products poses>
unnecessary,
> avoidable, involuntary, uninformed risks. The>
consumers, the producers,

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> the raw materials industries don't want these>
radioactive wastes or> risks.>
> COMPUTER MODELS NOT ACCURATE, RELIABLE, VERIFIABLE
> It is not credible to believe computer models can>
calculate and
> accurately predict any or ALL of the doses to the>
public and the
> environment from all of the potential radioactivity>
that could be
> released over time. Projections of "acceptable" or>
"reasonable" risks
> from some amount of contamination being released
are> meaningless and
> provide no assurance. Monitoring for the specific>
types and forms of
> radioactivity that could get out can be very>
expensive and tricky to
> perform. Hot spots can sneak through. We can't
trust> the nuclear
> generators to monitor their own releases.>
> EXPENSIVE TO MONITOR; IMPOSSIBLE TO VERIFY OR>
ENFORCE RELEASES
> No matter what level the NRC sets for allowable>
radiation risk, dose or
> concentration, it will be difficult to 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. We continue to>
do so.>
> EXISTING RADIATION DOESN'T JUSTIFY DELIBERATE>
ADDITIONS
> Naturally occurring background radiation cannot be>
avoided (except in
> some instances for example, reducing radon in
homes)> but its presence in
> no way justifies additional, unnecessary,>
involuntary radiation
> exposures, even if those exposures might be equal
to> or less than
> background. Nor does it justify shifting the>
economic liability from the
> generators of radioactive wastes and materials to>
the economic and
> health liability of the recycling industries, the>
public and the
> environment.> > SUPPORT METAL INDUSTRIES' "ZERO

TOLERANCE" OF> CONTAMINATION

> 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 opposition to> legalization of

> radioactive releases, but 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 into

> recycled materials and general commerce. The> problems that have been

> experienced by the steel recycling industry with> "generally-licensed

> sealed sources" getting into their facilities and> costing tens of

> millions of dollars to clean up should serve as a> warning not to let any

> other radioactive wastes and materials out of> regulatory control.>

> US AGENCIES MUST PREVENT FUTURE AND RECAPTURE PAST> RELEASES,

> PUSH INTERNATIONAL PROHIBITION

> The fact that radioactive waste is already getting> out should not be

> used to justify legal levels allowing more out. 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 contamination of the international> marketplace. We protect

> ourselves best by not facilitating international> radioactive commerce.>

> The fact that it is difficult and expensive to> monitor and detect

> radiation does not justify its release. It is all> the more reason to

> prevent any wastes getting out, so we don't have to> check routinely for

> contamination. The nuclear industry and regulators>

should be aware of
> what materials at reactor and weapons sites are >
wastes and which have
> been contaminated. Those materials must be
isolated, > not released, at
> any level. > > NRC HAS CLEARLY DECIDED TO
RELEASE-THIS MUST BE > REVERSED
> The mindset of the NRC appears convinced that it >
should legalize
> radioactive wastes being "recycled" into the >
marketplace. The NRC has
> stated in its Staff Requirements Memo that the >
standard must allow
> "releases" to take place and that all radioactive >
materials will be
> eligible for "clearance." This means that the NRC >
is not seriously
> examining all of the options available, such as >
non-release, even though
> the National Environmental Policy Act (NEPA) >
requires all options to be
> considered. > > NRC CONTRACTOR (SAIC) HAS CLEAR
CONFLICT OF INTEREST >
> Furthermore, the NRC is relying on a private >
contractor called Science
> Applications International Corporation (SAIC) to >
prepare the technical
> basis for the proposed regulation. This is a
blatant > conflict of
> interest. The NRC has not publicly disclosed the >
relevant economic
> interests of SAIC. The NRC has not notified the >
public that SAIC has
> simultaneously been working with or for other >
corporations with
> substantial economic interests in the Commission's >
determinations in
> this rulemaking. In particular, since mid-1996,
SAIC > has been the
> teaming partner of British Nuclear Fuels, Ltd. >
(BNFL) under a quarter
> billion DOE contract for recycling unprecedented >
amounts of contaminated
> radioactive metallic waste from the Oak Ridge TN >
uranium enrichment
> buildings. This situation calls into question the >
legality of the entire
> NRC process. > > EXTEND COMMENT PERIOD
> Since NRC is attempting to cover its requirements >

under NEPA to
> establish this radioactive "release" rule, the>
public comment period
> should be extended to allow the public the>
opportunity to hear about and
> comment on the proposal. > > In conclusion, we call
on the NRC to serve the
> interests of the public> instead of the nuclear
industry and
> #1 prohibit the release of radioactive materials>
into commerce,
> landfills and incinerators> #2 identify, track and
recapture the radioactive
> waste that has already> been released from nuclear
power and weapons
> facilities by federal and> state regulators
> #3 give the public at least 8 more months to>
comment.> >
Sincerely,>
Jennifer Mathews

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