

DOCKET NUMBER  
PROPOSED RULE **PR 20**  
**(64FR35090)**

DOCKETED  
USNRC

279

'99 DEC 20 A7:17

**LETTER TO THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION  
AGAINST RADIOACTIVE RECYCLING AND RELEASE**

RE: Nuclear Regulatory Commission 10 CFR 20 Release of Solid Materials at  
Licensed Facilities: Scoping Process for Environmental Issues and Notice of  
Public Meetings

October 6, 1999

To the United States Nuclear Regulatory Commission:

The environmental and public interest communities are declining to participate in the Nuclear Regulatory Commission (NRC)'s Atlanta rulemaking workshop for two reasons.

First, the concept of release of radioactively contaminated materials into the marketplace is unconscionable, morally abhorrent and contrary to the NRC's mission to protect public health and safety.

Second, we told you exactly that in 1990 with the BRC (Below Regulatory Concern) hearings and again in 1993 when we participated in the NRC rulemaking procedure which established the decommissioning criteria for nuclear power plants. The final decommissioning standard flies in the face of input the NRC was given by public interest groups and the American people to allow zero (0) release (above preexisting natural background). In fact, by the NRC's own estimates, thousands<sup>1</sup> of people could die if NRC's standard is used.

Our position remains: the NRC's enforced standard must be to contain radioactive wastes--isolate them from the environment.

<sup>1</sup> NRC estimates the Hypothetical Lifetime Risk from Continuing Annual Dose of 100 millirems TEDE/year is 3.5 fatal cancers per 1000 exposed. This is 1 fatal cancer in 286 individuals exposed at that dose rate. Source: Table 1, page 8, NRC BRC Policy Statement July 3, 1990, based on "Sources, Effects and Risks of Ionizing Radiation," United Nations Scientific Committee on the Effects of Atomic Radiation (UNSCEAR), 1988 Report and "Health Effects of Exposures to Low Levels of Ionizing Radiation, BEIR V," 1990, National Research Council, and NUREG/CR-4214 Rev. 1. The NRC decommissioning rule, 10 CFR 20 Subpart E, allows 25 to 100 to 500 millirems annual dose from a decommissioned site.

PR PR 20 64FR35090

DS10

Two other controversial and environmentally unacceptable practices are showcased in the current NRC process: dumping of so-called "low-level" radioactive waste and dismantling and landfilling of used nuclear power plants, the source of massive amounts of contaminated metal and soil.

We share a common concern for the high volume of contaminated metals, materials and earth that have been spoiled for other uses by the nuclear industry. It is high time our species faces the grim reality of nuclear waste and comes to terms with it.

There is no known safe level of exposure to radiation. Let us not be seduced by short-term economic concerns to make decisions that can wreak irrevocable damage in the gene pools of every species of animal and plant on our Earth.

The honorable nuclear work is now towards developing and implementing effective technologies for nuclear waste containment.

We call on the NRC to prohibit the release of radioactive materials and wastes to the marketplace and the environment.

Please enter these comments into the National Environmental Policy Act record.

Signed,

**REGIONAL, STATE and LOCAL**

**Glenn Carroll**  
Georgians Against Nuclear Energy

**Ed Arnold**  
Physicians for Social Responsibility/  
Atlanta

**Representative June Hegstrom,**  
District 66  
Scottdale, Georgia

**Joan O. King**  
20/20 VISION Georgia

**Sally Wylde, Marci McLendon**  
Atlanta Women's Action for New  
Directions-WAND

**Bob Darby, Tom Ferguson**  
Food Not Bombs  
Atlanta

**Leigh Lytle**  
Earth Challenge  
Decatur, Georgia

**Harry L. Williams**  
Coalition for a Healthy Environment  
Tennessee

**Jackie Kittrell, Cliff Honicker**  
American Env'tal Health Studies Project  
Knoxville, TN

**Tom Phillips**  
Nashville Peace Action  
Tennessee

**Ann Harris**  
We The People, Inc. of Tennessee  
Alliance for Public Health & Safety

**Mary Byrd Davis**  
Uranium Enrichment Project  
Earth Island Institute  
Georgetown, Kentucky

**Vina Colley**  
PRESS-Portsmouth/Piketon Residents  
for Environmental Safety and Security  
Ohio

**Harry Rogers**  
Carolina Peace Resource Center

**John Runkle**  
Conservation Council of North Carolina

**Jim Warren**  
North Carolina WARN

**David Druding**  
Peoples' Action for a Safe Environment  
(PASE)  
Fayetteville, Arkansas

**B.J. Medley**  
ECO  
Oklahoma

**Scott Portzline**  
Three Mile Island Alert  
Harrisburg PA

**Jonathan Parfrey**  
Physicians for Social Responsibility/  
Los Angeles

**Judith Johnsrud, Ph.D.**  
Environmental Coalition on Nuclear  
Power  
Pennsylvania

Dave Kraft  
Nuclear Energy Information Service  
Illinois

Jennifer Olaranna Viereck  
Healing Global Wounds  
California

Leon Glicenstein, Ph.D.  
Central Pennsylvania Citizens for  
Survival

Peg Ryglisyn, Michael Albrizio  
Connecticut Opposed to Waste

Madelyn Hoffman  
Grass Roots Environmental  
Organization  
New Jersey

Michael Gregory  
Arizona Toxics Information

Corinne Carey, Alice Hirt  
Don't Waste Michigan

Karl J. Novak  
Pennsylvania Environmental Network

Liz Apfelberg  
San Luis Obispo Mothers for Peace  
California

Karen Hadden  
Peace Action - Texas

Jaime Chavez  
Water Information Network  
Albuquerque, NM

Bruce A Drew  
Prairie Island Coalition  
Minnesota

Deb Katz  
Citizens Awareness Network  
New England

Judy Treichel  
Nevada Nuclear Waste Task Force

Don Finch  
F.A.C.T.S. (For A Clean Tonawanda  
Site), Inc.  
Kenmore, New York

Lea Foushee  
North American Water Office  
Minnesota

Laurence LaFond  
North American Water Office  
Oregon

Mark D. Stansbery  
Community Organizing Center  
Columbus, Ohio

Michael Welch  
Redwood Alliance  
Arcata, California

Joe Mirabile  
EcoBridge  
San Francisco, California

Paige Knight  
Hanford Watch  
Oregon

Chris Williams, Grant Smith  
Citizens Action Coalition of Indiana

Robin Richman  
Steppin' Out  
Chicago, IL

Joseph W. Wilson  
Earthwise Co.  
Lewisville, Texas

Kate R. Lozier, CPA  
KRLCP, Inc. / TuffBaggs  
East Greenbush, NY

Diane Klostermeier  
Safeguard Our State Committee  
Arizona

Chuck Johnson  
Center for Energy Research  
Salem, Oregon

David Ellison  
Green Party of Ohio

Bob Brister  
Madera County Greens  
California

Lisa Guido  
The Catholic Worker Organization of  
Ithaca  
New York

Sara Shannon  
MothersAlert  
New York, New York

Molly Johnson  
Save Ward Valley  
California

Bill Smirnow  
Nuclear Free New York

Carole Starkes  
e-ESL/Maple School  
San Francisco, California

Susan Clark  
Americans for a Safe Future  
California

Tim Judson  
Central New York--Citizens Awareness  
Network

Henry Peters  
Radiological Evaluation and Action  
Project-Great Lakes

Susan Griffin  
Chenango North Energy Awareness  
Group  
South Plymouth, N.Y.

Stephen M. Brittle  
Don't Waste Arizona, Inc.

Frank C. Subjeck  
Air, Water, Earth, Org.  
Arizona

Betty Schroeder  
Arizona Safe Energy Coalition

Linda Lynch  
Hudspeth Directive for Conservation  
Texas

Shean BJORALT  
Earth Cycles, LTD  
Minneapolis, MN

Chris Drew  
Uptown Multi-Cultural Art Center  
Chicago, Illinois

Chris Trepal  
Earth Day Coalition  
Ohio

Terry Lodge  
Toledo Coalition for Safe Energy

Kathryn Cumbow  
Citizens for Alternatives to Chemical  
Contamination  
Citizens for a Healthy Planet  
Michigan

Kyle Rabin  
Environmental Advocates  
New York

Frank McLaughlin  
Environmental Response Network  
Ocean View, NJ

Amy Manel  
Stockton Peace Action  
Pomona, NJ

Lloyd Marbet  
Don't Waste Oregon

Norm Cohen  
Unplug Salem Campaign  
Linwood, NJ

Jane Williams  
California Communities Against Toxics

Jenny Carter  
Vermont Public Interest Research Group

Jessica Hopper  
Hyper PR  
Chicago, Illinois

LaNell Anderson  
Grandparents of East Harris County  
Texas

Harvey Wasserman  
Citizens Protecting Ohio (C-PRO)

Loren Olson  
Tippecanoe Environmental Council  
West Lafayette, Indiana

Greg Wingard  
Waste Action Project  
Seattle, Washington

Roger Snyder  
SHAD (Sound & Hudson against  
Atomic Development)  
Huntington, NY

Janet Marsh Zeller  
Blue Ridge Environmental Defense  
League  
North Carolina

Maite Diez  
The Inner Ear  
Hull, MA

Diane A. Burton  
Heartland Operation to Protect the  
Environment  
Nebraska

H.G. (Skip) Brack  
Center for Biological Monitoring  
Hulls Cove, ME

Ray Shadis  
Friends of the Coast - Opposing Nuclear  
Pollution  
Edgecomb, Maine

Richard Geary  
Citizens Action for Safe Energy  
Oklahoma

Richard Boren  
Southwest Toxic Watch  
Tucson, AZ

Robert Lepley  
Long Island Alliance for Peaceful  
Alternatives

**NATIONAL**

**Susan Shaer, Pat Ortmeier**  
Women's Action for New Directions-  
WAND  
Arlington, Massachusetts

**Diane D'Arrigo**  
Nuclear Information and Resource  
Service  
Washington, DC

**Wenonah Hauter**  
Public Citizen  
Washington, DC

**Anna Aurilio**  
US Public Interest Research Group  
Washington, DC

**Scott Denman**  
Safe Energy Communication Council  
Washington, DC

**Alice Slater**  
Global Resource Action Center for the  
Environment (GRACE)  
New York, New York

**Jay M. Gould, Ph.D.**  
Radiation and Public Health Project  
New York, New York

**Bonnie Urfer, John LaForge**  
Nukewatch  
Wisconsin

**Patricia Birnie**  
GE Stockholders' Alliance  
Arizona

**INTERNATIONAL**

**Dr. Helen Caldicott**  
Founding President  
Physicians for Social Responsibility

**Damon Moglen**  
Greenpeace

**Alexander B. Kuzma**  
Children of Chernobyl Relief Fund

**Pamela Ransom**  
Women's Environment and  
Development Organization

**Barbara Wiedner**  
Grandmothers For Peace International

**Francis U. Macy**  
Center For Safe Energy  
Earth Island Institute

**Paxus Calta**  
Friends of the Earth International

**Mary Beth Brangan, Jim Heddle**  
The Nuclear Democracy Network  
California

**Laurie Grossman**  
Y2K World Atomic Safety Holiday -  
WASH Campaign

**Wendy Oser**  
Nuclear Guardianship Project  
Berkeley, California

**Peer de Rijk**  
World Information Service on Energy-  
WISE International  
Amsterdam, The Netherlands

**Pascal Braud**  
Reseau Sortir du Nucleaire  
Lyon, France

**INDIVIDUALS**

**Kev Hall  
Dunedin, FL.**

**Marvin Lewis  
Philadelphia, PA**

**J.A. Savage  
Oakland, CA**

**Howard Siegel  
Bronx, NY**

**Peggy Pryor  
Andrews, Texas**

**Amy Cockerill  
Dayton, Ohio**

**Eric Strahan  
Fullerton, California**

**Barbara S. Richardson  
Cherokee, NC**

**Debbie Ortman  
Duluth, MN**

**Graham Gerdeman  
Nashville, TN**

**Jennifer Nagy  
Columbus, Ohio**

**Karen Bloustine  
El Paso, TX**

**Scott Shively  
Seattle, WA**

**Karen Charman  
New York, New York**

**Richard Dawson  
Torrance, CA**

**David W. Chappell  
Penryn, California**