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**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, thousands¹ 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.

¹ 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.

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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**