



Conservation Council of North Carolina

PO Box 12671
Raleigh, NC 27605
ccnc@bellsouth.net

DOCKETED

Phone (919) 832-8083
Fax (919) 829-1192
www.serve.com/ccnc/

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

OFFICE
OF
ADJUDICATION

December 15, 1999

NRC Chairman Richard Meserve
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Rulemaking and Adjudications Staff

Re: Proposal to allow release of radioactive material into commerce

Dear Chairman Meserve:

The Conservation Council of North Carolina is a statewide environmental organization with 30 member groups and more than 1600 individual members. We have been involved in nuclear safety and nuclear waste issues before state and federal regulators for 30 years and have consistently maintained that no radioactive material should be released into the environment.

We therefore call on the Nuclear Regulatory Commission to abandon any effort to allow the release of radioactive materials into commerce through so-called "recycling" or "clearance" or "exemption" schemes. No radioactive waste should be considered *de minimus* or "below regulatory concern." No additional exposure is an acceptable or reasonable risk to public health.

Further, we are concerned about radioactive waste that has already been released into commerce from nuclear power, other commercial licensees and weapon facilities. The current methods of releasing radioactive wastes must immediately cease and the NRC should commence a full accounting and recapture of the materials already released.

Rather than allow more radioactive material into the environment, the NRC should be leading the nuclear industry into generating less radioactive waste as its first priority. Secondly, any waste that is generated should be isolated from the environment.

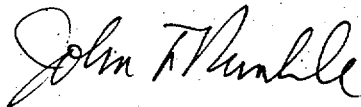
The National Environmental Policy Act, 42 U.S.C. 4321 et seq., calls for the NRC to completely analyze all of the reasonable alternatives, and show that any option that is selected has the least impact on public health and the environment. In this case, the alternative of non-release is clearly the one that is most in the public interest.

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It has also come to our attention that there has been a request to extend the comment period on the scoping for the environmental documents for an additional eight months. Given the need for a public debate on this proposal, the NRC should grant the extension.

Please send us a copy of all environmental documents you prepare on this subject.

Sincerely,

A handwritten signature in cursive script that reads "John D. Runkle". The signature is written in black ink and is positioned above the printed name.

John D. Runkle

cc. NC Congressional Delegation