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

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December 16, 1999

Secretary
US Nuclear Regulatory Commission
Washington, DC 20555-0001

'99 DEC 21 P4:15

RE: Release of Solid Materials for recycling and re-use
FR 6-30-99 p. 35090ff and
NRC Draft NUREG 1640 3-99

AD

Please adopt the PRECAUTIONARY PRINCIPLE of protecting people and ecological systems of harm.
Studies now confirm that low doses of radiation, received at repetitive low dose rates may be even more damaging than higher doses.


Dose limits must take into account all additive exposures from multiple sources and account for synergistic interrelationships between and among radiation and other pollutants in the environment. In addition, dose limits must take into account all living things and not just adult human males. The NRC's acceptable fatal cancer rate of one in 286 is NOT ACCEPTABLE. These proposed regulations will erode this low standard.

PLEASE:
Do not deregulate
Do not allow ("BRC", "de minimus", "clearance level", what ever you want to call them) materials that are radioactively contaminated such as solid materials and waste that result from any operations and/or decommissioning and in particular power reactors to be released at all and certainly do not allow release into the waste stream and consumer products.

The exemption of recyclers from liability recently passed is enough reason not to take any action allowing any releases.

I am OPPOSED to deregulation, release, recycling, re-use of any radioactive material.
I am in SUPPORT of isolation, zero release, and zero dose of radioactive materials.

PLEASE halt production of nuclear waste and PLEASE recapture what has been released.

Sincerely,

Tina Daly
1880 Pickering Road, Phoenixville, PA 19460

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