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South Bend, IN 46629 (219) 232-7905

November 9, 2000

David L. Meyer, Chief
Rules and Directives Branch, Office of Administration
Mail Stop T-6D59
U.S. Nuclear Regulatory Commission
Washington, D.C. 2055-0001

Dear Mr. Meyer,

The following constitutes the commentary of the Citizens Action Coalition of Indiana (CAC) on the proposed sale of radioactive contaminated soil by the Nuclear Regulatory Commission:

On behalf of our over 300,000 members statewide, the Citizens Action Coalition of Indiana opposes any such sale. Radioactive contaminated soil is toxic waste; it should be treated as such and be kept isolated from the environment, not dispersed into the environment.

Research has shown that there is no such thing as a "safe" level of radioactive exposure; even natural background levels of radioactivity are responsible for thousands of cases of cancers and genetic mutations annually throughout the world. Furthermore, background radiation levels worldwide have been increasing since the beginning of the atomic age due to fallout and leaks from nuclear weapons testing, and from dispersals of radioactivity into the environment from nuclear weapons facilities and commercial nuclear power plants.

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E-RIJS=ADM-03 Cal: T. Nicholura (TSN) Any further increase in background radiation levels would certainly result in additional cancers. Given the millions of potential exposures widespread dispersal of contaminated soil would entail, even if the risk to any single individual is very small, the number of additional cancers generated could be in the hundreds or thousands.

Also, that exposure would be without the informed consent or even the knowledge of those exposed, and it would produce no benefit to them. The only benefit would be to the nuclear power industry, which would see increased profit as it externalizes its radioactive waste disposal costs to the public in the form of increased health costs and future taxpayer-funded cleanup costs.

For these reasons, therefore, the CAC opposes the proposed sale of radioactive contaminated soil.

Sincerely,

Roger Voelker,

Citizens Action Coalition of Indiana