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From: "C. Liu" <annarky@excite.com>
To: "Secretary Nuclear Regulatory Commission" <secy@nrc.gov>
Date: Fri, Jun 27, 2003 12:54 PM
Subject: Comments on Controlling the Disposition of Solid Materials (10 CFR Part 20)

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June 27, 2003

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USNRC

Nuclear Regulatory Commission:

June 27, 2003 (2:40PM)

Dear Secretary:

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

I don't want to buy a geiger counter. I don't want to carry it with me every time I shop for products that contain metal. I don't want to worry about my family and friends unknowingly coming into contact with radioactive waste. I don't want it in the environment. In my wildest imagination, I can't think of anyone who would disagree with me on this issue. Not even you.

The NRC's proposed "rulemaking on controlling the disposition of solid materials" should be restricted to ONLY those regulatory options which would STRICTLY PROHIBIT the deregulation of any solid materials containing or contaminated with manmade radiation, and require that such materials be disposed of ONLY in secure, licensed facilities that are designed to isolate such radioactive waste from humans and the environment.

The NRC accepts the validity of the LNT model of human exposure to radioactivity, which states that "any increase in dose, no matter how small, results in an increase in risk" to human health. Despite this, the Commission is obstinately pursuing a dangerous proposal that would, in fact, result in exposing the public to greater doses of radioactivity! NRC Chairman Richard Meserve, in the NRC Commission Voting Record of October 25, 2002, advised that "it would not be appropriate to mask the Commission's continuing support for the release of solid material." It is an OUTRAGE and a travesty of proper government regulation that the NRC is effectively pursuing a subsidy worth billions of dollars that rewards waste generators for irresponsibly scattering their waste into the unregulated environment and ducking responsibility for ANY of the consequences.

Under absolutely NO conditions should nuclear waste be deregulated, dumped in unlicensed facilities that are not prepared to monitor for or contain radioactive waste, or allowed into general commerce.

An agency that considers its "primary mission" to be protecting public health and safety from the dangers of radiation SHOULD NOT EVEN *CONSIDER* any rollback in regulatory protections. Since the current process involves the NRC's allegedly serious consideration of various alternatives—ranging from no release of materials to unrestricted release—while the Commission *openly* acknowledges a prejudice favoring release, the results of this rulemaking will likely endanger not only human health and ecological integrity, but the integrity of the NRC as a credible

regulatory agency, as well.

The NRC's primary mission to "to protect public health and safety, and the environment from the effects of radiation from nuclear reactors, materials, and waste facilities" can only be upheld by (at a minimum) establishing permanent policy restricting ALL radioactive material waste from general commerce and requiring it to be disposed of in an NRC- or Agreement State-licensed low-level waste disposal site, best articulated as "Alternative 5" in the notice published in the Federal Register on February 28, 2003.

Further regulations and protections should be implemented as needed to fulfill this mission in a serious and responsible manner. I urge you to protect us and future generations from a potential catastrophe of enormous proportions.

Sincerely,

C. Liu