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To: <secy@nrc.gov>
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Subject: Option 6 for "Rulemaking on Controlling the Disposition of Solid Materials"

1868

The NRC is currently considering 5 options for how radioactive materials (RAM) should be treated. Each of these 5 options appear to loosen regulation of RAM, and the NRC is considering a new rule that would allow some RAM to be treated as if they were not radioactive. This would allow such materials to find their way into municipal landfills, garbage incinerators, or even normal commerce (materials could be used to make belt buckles, utensils, girders for construction, etc.).

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I believe this is an instance in which deregulation should be studiously avoided. Taking currently licensed and regulated nuclear waste and reclassifying it as being fit for entry into society will result in unnecessary exposure. I believe all efforts should be made to isolate, monitor, and manage RAM. That is why I cannot support any of the 5 Options that have been put forth as part of your scoping process. Options 1 and 2 allow for unrestricted release either on a case-by-case basis or through dose-based standards. Option 3 allows conditional or restricted uses of RAM in which gamma-emitting nuclear waste could be used to make roadbeds or sewage pipes. Option 4 allows disposal in EPA landfills, dumps that were not designed to manage or isolate RAM and which have been known to leak. Option 5 is the best of the lot in that it is the most restrictive regarding release of RAM.

The NRC has claimed that previous releases of radioactive waste have had no effect. In response, the Sierra Club has put forth Option 6 which asks the NRC to prove this claim by identifying where the nuclear waste has gone and studying its impact.

I believe it is in the best interests of this country to maintain strict standards that would prevent any release of radioactive waste, waste which can remain radioactive for literally millions of years. That is why I support Option 6, which would strengthen nuclear waste disposal and provide more meaningful data that could be used to guide future disposal.

Thank you for inviting the public to comment,

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