



2567

DOCKET NUMBER  
PROPOSED RULE **PR 20**  
(68FR09595)

Buyers Up • Congress Watch • Critical Mass • Global Trade Watch • Health Research Group • Litigation Group  
Joan Claybrook, President

DOCKETED  
USNRC

June 30, 2003

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
Attention: Rulemaking and Adjudications Staff

July 1, 2003 (5:00PM)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**RE: Comments on scope of "Rulemaking on Controlling the Disposition of Solid Materials" (10 CFR Part 20)**

Dear Secretary:

In response to the Federal Register notice of February 28, 2003 regarding the rulemaking cited above, please accept the attached joint statement, endorsed by 124 groups, opposing radioactive 'recycling' and deregulation of nuclear waste materials. If you should have any questions regarding the statement or the signatories, please feel free to contact me at 202-454-5109.

Sincerely,

Joseph P. Malherek  
Policy Analyst  
Public Citizen's Critical Mass Energy and Environment Program

Ralph Nader, Founder

215 Pennsylvania Ave SE • Washington, DC 20003 • (202) 546-4996 • [www.citizen.org](http://www.citizen.org)

Template = SECY-067

SECY-02

## **Statement Opposing Radioactive 'Recycling' and Deregulation of Nuclear Wastes**

*Be it resolved that the undersigned entities hereby support a prohibition on deregulation of radioactive wastes and materials.*

*This includes any and all deregulation of radioactive wastes and materials for "clearance," "release," "recycling," "exemption," listing as "below regulatory concern," or any other legalistic mechanism that could result in the dispersal of nuclear wastes and materials into public commerce, unlicensed disposal, or designation and treatment as non-radioactive.*

*Such practices pose an indefensible hazard to public health and the environment for current and future generations.*

*Since there is no safe level of ionizing radiation, nuclear power, weapons and mining wastes should not be forced on an unknowing, unconsenting public.*

*Radioactive waste should not be treated as an asset or a commodity, and must be contained and isolated from the public and the environment for its entire hazardous life, at the expense of the waste generators.*

Endorsed by the following 124 organizations:

First Name	Last Name	Organization	City	State
George N.	Lyne	We the People	Lowell	AR
Thomas	Saporito	National Environmental Protection Center (NEPC)	Tonopah	AZ
Felice & Jack	Cohen-Joppa	Nuclear Resister	Tuscon	AZ
Mha Atma	Khalsa	Earth Action Network	Los Angeles	CA
Michael	Green	Center for Environmental Health	Oakland	CA
Bernice	Kring	Grandmothers for Peace, Sacramento Chapter	Sacramento	CA
Aroza	Simpson	Gray Panthers of San Francisco	San Francisco	CA
Priscilla	Thomas	Mendocino Environmental Center (MEC)	Ukiah	CA
Susan	Tansky	California Alliance in Defense of Residential Environments (CADRE)	Sherman Oaks	CA
Robert	Gould	Physicians for Social Responsibility	Berkeley	CA
Tom	Lent	Energy & Environmental Consulting	Berkeley	CA
Michael	Welch	Redwood Alliance & REEI	Arcata	CA

**Ralph Nader, Founder**

215 Pennsylvania Ave SE • Washington, DC 20003 • (202) 546-4996 • [www.citizen.org](http://www.citizen.org)

Marylia	Kelley	Tri-Valley CAREs (Communities Against a Radioactive Environment)	Livermore	CA
Bill	Powers	Congress of California Seniors	Sacramento	CA
Joe	Mirabile	EcoBridge	San Francisco	CA
Roger	Herried	Abalone Alliance	San Francisco	CA
Terry	Benioff	T.A.B. Transcription	El Sobrante	CA
Bonnie	Perkins	Lake County California Green Party	Cobb	CA
Karil	Daniels	Point of View Productions	San Francisco	CA
Philip	Klasky	Bay Area Nuclear (BAN) Waste Coalition	San Francisco	CA
Ruth	Zeitzew	Women For	Beverly Hills	CA
Paula	Elofson-Gardine	Environmental Information Network (EIN), Inc.	Lakewood	CO
Carolyn	Hilton	EnviroCitizen	Denver	CO
Dan	Bishop	International Depleted Uranium Study Team	Saguache	CO
Yael	Martin	Promoting Enduring Peace	Milford	CT
Peg	Ryglisyn	Connecticut Opposed to Waste	Broad Brook	CT
Judi	Friedman	People's Action for Clean Energy (PACE)	Canton	CT
Richard	Miller	Government Accountability Project (GAP)	Washington	DC
Diane	D'Arrigo	Nuclear Information and Resource Service (NIRS)	Washington	DC
Wenonah	Hauter	Public Citizen	Washington	DC
Jason	Boehk	Florida Alliance for Safe Foods	Sarasota	FL
Bobbie	Paul	WAND (Women's Action for New Direction) Atlanta	Atlanta	GA
Glenn	Carroll	Georgians Against Nuclear Energy (GANE)	Atlanta	GA
Amy Ray	Emily Saliers	Indigo Girls	Decatur	GA
Merle P.	Prater	Integrative Educational Systems	Ames	IA
Gwen	Sanchirico	Idaho Green Party	Boise	ID

Jeremy	Maxand	Snake River Alliance	Boisie	ID
Samuel	Epstein	Cancer Prevention Coalition	Chicago	IL
John	Blair	Valley Watch, Inc.	Evansville	IN
Chris	Williams	Citizens Action Coalition of Indiana	Indianapolis	IN
Corinne	Whitehead	Coalition for Health Concern	Benton	KY
Mary	Davis	Yggdrasil Institute (a project of Earth Island Institute)	Georgetown	KY
Ben	Perry	Appalachia - Science in the Public Interest	Mt. Vernon	KY
Barbara	Warner	Marion County Water Watch	Lebanon	KY
Robert R.	Holt	Truro Recycling Committee	Truro	MA
Jennifer	Gutshall	Citizens' Awareness Network	Shelburne Falls	MA
Mary	Lampert	Massachusetts Citizens for Safe Energy	Boston	MA
Patricia	O'Leary	Prince George's/Greenbelt Greens of MD	College Park	MD
Mary Ellen	Gondeck	Sisters of St. Joseph Office of Peace and Justice	Madison Heights	MI
Timothy	Gallagher	Peoples Food Co-op	Kalamazoo	MI
Alice	Hirt	Western Michigan Environmental Action Council; Don't Waste Michigan	Holland	MI
Laura	Meisler	People's Food Cooperative	Ann Arbor	MI
Keith	Gunter	Citizens' Resistance at Fermi Two	Monroe	MI
Michael J.	Keegan	Coalition for a Nuclear Free Great Lakes	Monroe	MI
Bruce	Drew	Prairie Island Coalition	Minneapolis	MN
Jeanne	Wingenter	Office of Justice, Peace & Integrity of Creation School Sisters of Notre Dame, Mankato Province	St. Paul	MN
Bernie	Lindberg	Mankato Area Environmentalists	Mankato	MN
Betty	Kenny	Rochester Minnesota Franciscan Justice and Peace Network	West St. Paul	MN
George	Crocker	North American Water Office	Lake Elmo	MN
Judi	Poulson	Fairmont, MN Peace Group	Fairmont	MN

Lea	Foushee	North American Water Office	Lake Elmo	MN
Diana	McKeown	Clean Water Action Alliance of Minnesota	Minneapolis	MN
Diana	Oleskevich	Sisters of St. Joseph of Carondelet, St. Louis Province	St. Louis	MO
Bea	Covington	Missouri Coalition for the Environment	St. Louis	MO
Penny Lynn	Dunn	TACENDA	Marshfield	MO
Paul	Gallimore	Long Branch Environmental Education Center	Leicester	NC
Jim	Warren	North Carolina Waste Awareness & Reduction Network (NC WARN)	Durham	NC
E.M.T.	O'Nan	Protect All Children's Environment	Marion	NC
Buffalo	Bruce	Western Nebraska Resources Council	Chandron	NE
Edith	Gbur	Jersey Shore Nuclear Watch	Brick	NJ
Joni	Arends	Concerned Citizens for Nuclear Safety (CCNS)	Santa Fe	NM
Jay	Coghlan	Nuclear Watch of New Mexico	Santa Fe	NM
Sue	Dayton	Citizen Action	Sandia Park	NM
Larry	Bernard	Franciscan Province of Our Lady of Guadalupe	Laguna	NM
Anna M.	Rondon	Southwest Indigenous Uranium Forum	Gallup	NM
Kalynda	Tilges	Shundahai Network	Las Vegas	NV
Peggy	Johnson	Citizen Alert	Las Vegas	NV
Babette	Linfield	Professionals' Network for Social Responsibility	New York	NY
Kathleen	Curtis	Citizens' Environmental Coalition	Albany	NY
Kyle	Rabin	Riverkeeper, Inc.	Garrison	NY
Mike	Schade	Citizens' Environmental Coalition	Buffalo	NY
Arnold	Gore	Consumers Health Freedom Coalition	New York	NY
Eileen J.	Ain	New York City Mother's Acting Up	New York	NY
Alice	Slater	Global Resource Action Center for the Environment (GRACE)	New York	NY

Kathleen	Whitley	Sustainable Energy Alliance Long Island	Bridgehampton	NY
Maurice	Paprin	The Fund For New Priorities in America	New York	NY
Henrietta	Wise	Persistent Organic Pollutants Working Group	Olivebridge	NY
Dave	Channon	Home Rule for the Catskills	Shandaken	NY
Rosemarie	Pace	Pax Christi Metro New York	New York	NY
Rebecca	Pearl	Women's Environment and Development Organization (WEDO)	New York	NY
Stephen	Graham	Konscious Media, Inc.	New York	NY
Dana Lee	Cohen	The New York Green Party	New York	NY
Gordian	Raacke	Citizens Advisory Panel (CAP) -- Long Island's Energy Watchdog	Bridgehampton	NY
Stuart	Greenberg	Environmental Health Watch	Cleveland	OH
Chris	Trepal	Earth Day Coalition	Cleveland	OH
Carrie	Dickerson	Citizens Action for a Safe Energy, Inc.	Claremore	OK
Stefanie	Collins	Amnesty International, University of Oklahoma	Norman	OK
Michael	Carrigan	Oregon PeaceWorks	Salem	OR
Lynn	Sims	Don't Waste Oregon	Portland	OR
Nina	Bell	Northwest Environmental Advocates	Portland	OR
Katharine	Dodge	Northeast Pennsylvania Audubon Society	Honesdale	PA
Patricia	Ameno	Citizen's Action for a Safe Environment (C.A.S.E.)	Leechburg	PA
Donna	Cuthbert	The Alliance For A Clean Environment	Stowe	PA
Sue	Fracke	Citizens Against Hazardous and Nuclear Waste	Sugarloaf	PA
Gregg	Jocoy	York County Green Party	Fort Mill	SC
Elizabeth	Barger	PeaceRoots Alliance	Summertown	TN
Walter	Stark	Cumberland Countians for Peace & Justice	Pleasant Hill	TN
Ralph	Hutchinson	The Oak Ridge Environmental Peace Alliance	Oak Ridge	TN

Charles	Lord	Obed Watershed Association	Pleasant Hill	TN
Terry	Sweeton	Citizens for Smart Choices	Hartsville	TN
Donald B.	Clark	United Church of Christ, Network for Environmental & Economic Responsibility	Pleasant Hill	TN
Ruth	Roberts	Fund for Nuclear Responsibility	Georgetown	TX
Mavis	Belisle	The Peace Farm	Panhandle	TX
Phyllis	Glazer	Mothers Organized to Stop Environmental Sins (M.O.S.E.S.)	Dallas	TX
Becky	Bornhorst	Downwinders at Risk Education Fund	Duncanville	TX
Heber	Kimball	Neurofeedback Center	So Ogden	UT
Netaka	White	Addison County Peace Coalition	Middlebury	VT
Amy	Shollenberger	Northern Vermont Citizen's Awareness Network	Johnson	VT
Alexis	Lathem	Rural Vermont	Montpelier	VT
Patricia	Porter	Port Townsend Peace Movement, DU Study Group	Port Townsend	WA
Howard	Pellett	Green Party of Skagit County (Washington)	Anacortes	WA
Guy	Wolf	The DownRiver Alliance	Stoddard	WI
Gayle	Shemezis	Miracle Acres	Friendship	WI
Vivian	Stockman	Ohio Valley Environmental Coalition	Huntington	WV