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Annette L. Vietti-Cook
Secretary of the Commission
Nuclear Regulatory Commission
Washington, District of Columbia
20555 United States of America

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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Dear Secretary Vietti-Cook:

I am writing to OPPOSE your recent proposal to implement EPA's revised radiation protection standard for Yucca Mountain. EPA's proposed standard is still a draft, and is presently being commented on by the public. By proposing to implement this draft standard, NRC is acting as though the proposed standard will become the final rule – meaning that public comment will have no effect. This assumption conflicts with the very intention of the public comment process. It is highly inappropriate for NRC to not wait until EPA has taken public comment into account and issued a final standard, before going forward.

In addition, the radiation standard being proposed by EPA is inadequate for protecting public health and does not comply with federal law. Although the standard now extends through a more appropriate timeframe, the two-part standard burdens future generation with 23 times the radiation we ourselves are willing to bear. There is no scientific justification for this, and this standard would be the least protective radiation standard in the world. In fact, EPA's proposed standard is not even consistent with it's own previous recommendations, which specifically state that exposures above 25 mrem per yr are unacceptable.

Simply put, EPA's proposed standard ignores the scientific consensus on the health impacts of radiation, and the many unresolved problems surrounding radioactive waste. The standard will set a terrible precedent; lowering the bar for radiation protection around the country.

NRC should immediately withdraw its premature proposal to implement EPA's draft standard, and instead allow EPA's standard to run its course through public comment. Only when this comment process is done, and EPA has responded and proposed a final standard, should NRC consider and evaluate this standard for implementation into its own regulations.

Sincerely,



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