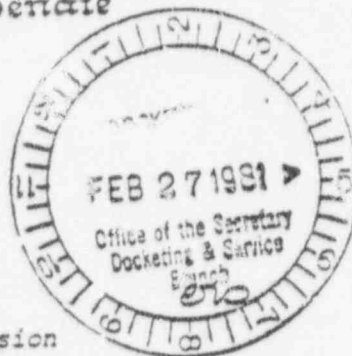


DOCKET NUMBER FR-30, 32, 70, 150  
PROPOSED RULE (45 FR 70374)  
SMELTED ALLOYS

3358

United States Senate



Respectfully referred to:

Congressional Liaison  
Nuclear Regulatory Commission  
1717 H Street, N.W.  
Washington, D.C. 20555

Because of the desire of this office to be responsive to all inquiries and communications, your consideration of the attached is requested. Your findings and views, in duplicate form, along with return of the enclosure, will be appreciated by

A handwritten signature in dark ink, appearing to read "Arlen Specter".

U.S.S.  
Arlen Specter

Form #2

8108270134

231 N Third St  
Lewisburg, Pa 17837

December 23, 1980

REC'D JAN 06 1981

Governor Richard Thornburgh  
U.S. Senator John Heinz  
U.S. Senator Arlen Specter  
U.S. Representative Allen Ertel  
State Senator Ed Heldrick  
State Representative John Showers

DOCKET NUMBER PR-30, 32, 70, 150  
PROPOSED RULE (45 FR 70374)  
SMELTED ALLOYS

3358  
Cherry



Dear Sirs,

We are writing in regard to recently announced (in Federal Register notices on October 8 and 27, and in NUREG-0518) plans by the NRC to revise regulations governing the "disposal" of certain radioactive materials. Although the period for comments has closed, we feel these proposed changes in NRC regulations could have such long-range and damaging effects that we are writing to protest them. The proposed changes are grossly improper, and wholly violate the mandate of the Atomic Energy Act to protect the public health, and the requirements of the National Environmental Policy Act.

Briefly, the proposed changes would permit liquids containing radioactive tritium and carbon-14, and liquid tulolene (itself highly toxic), to be disposed of without restriction as to their radioactive content. The total amount would be some 200,000 to 400,000 gallons per year to be disposed of by shallow burial. Also, animal carcasses contaminated with the same radioactive elements would be allowed unrestricted disposal, presumably in ordinary landfills. Finally, the changed regulations would permit metals contaminated with radioactive technetium-99 and uranium to be "recycled" - that is, radioactive copper, iron, and nickel could be smelted and mixed with uncontaminated metals for subsequent use in all sorts of consumer articles. The NRC has the gall to express concern about foundry workers who might come into contact with such metals, without mentioning one word of concern for the consumers - including children - who will regularly come into contact with radioactive cars, coins, toys, furniture, cooking utensils, etc. If these policies are implemented, apparently these bureaucrats have forgotten the problems encountered by residents of Grand Junction, Colorado, who used radioactive mill tailings in building materials and the problems of the people living near the mill - but we're sure those people have not forgotten. Are we now to spread the problem nationwide?

Perhaps the NRC feels comfortable in "solving" a problem by merely redefining it as a dispersion and dilution problem. And the proposed changes in regulations would "solve" some of the problem for some people; that is the DOE would be able to more easily get rid of waste metals from its gaseous diffusion plants, and research institutions would have less of a problem disposing of radioactive liquids and carcasses; and burial trenches will fill up more slowly (thus giving the impression that the problem is in hand); and both groups would save money. But as usual, the public must bear the brunt of these relaxed standards. We are the ones who live next to the landfills where radioactive carcasses will be disposed; and who live near burial trenches where radioactive and toxic liquids will be dumped (and who drink the water that may be contaminated as a result); and who will be exposed to radioactive metals in all sorts of (heretofore) benign forms. The NRC (as always) claims that added exposures to the public will be a "negligible addition" to natural background radiation. But how much additional radiation must we accept from those who are supposedly looking after our health and safety? Each added amount of radiation, no matter how "negligible" in itself, increases what we already must live with. We cannot continue to measure each bit of radiation as if it acted in a vacuum - it is the total exposure over

time that causes problems, and the NRC proposes to increase the total, and to spread it around to all of us. These proposed changes in regulations represent a perverse bureaucratic solution to some of the radioactive waste problem. They are insidious, in that they open the way for further relaxation of health standards and they are a totally wrong-headed approach to the problem of radioactive waste.

We feel so strongly about this latest NRC attempt to ignore its own regulatory function that we are going beyond a polite request for your comments: we demand to know your position as our elected representative on this issue and request that you take whatever action you can. We look forward to hearing from you. Thank you.

Sincerely,

*Mary F Ostrander*  
Mary F Ostrander

*D L Mann*  
David L Mann

cc Comm. Ahearn  
Comm. Bradford  
Comm. Gilinski  
Comm. Handrie

**EXECUTIVE OFFICERS**

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DON THOMAS

**VICE PRESIDENT**  
ROBERT PIGMAN

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FRANK TYKARSKI

**TRUSTEES**  
DENNIS SACCOMANO, CHAIRMAN  
RONLAD FERRIT  
WILLIAM O'MALLEY

**United Steelworkers of America**

**AFL-CIO**

**District 15 -- Local Union No. 1219**

1206 BRADDOCK AVENUE  
BRADDOCK, PENNSYLVANIA 15104

PHONE 271-4555

February 13, 1981

**GRIEVANCE COMMITTEE**

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STAFF REPRESENTATIVE  
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DOCKET NUMBER FR-30, 32, 70, 150  
PROPOSED RULE (45 FR 70374)  
SMELTED ALLOYS

3357

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 29555

Attention: Docketing and Service Branch

Dear Secretary:

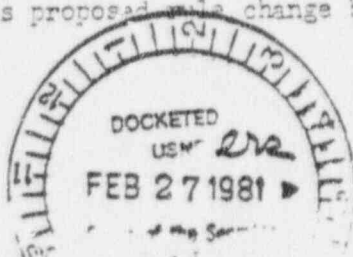
This letter is in response to the proposed rule change allowing the recycling of radioactive scrap. We are opposed to this proposal for the following reasons:

1. We are opposed to the increase in back-ground radiation that this would allow. We produce steel for consumer items. Although you claim that by diffusing this scrap with non-contaminated scrap, the health effects on the general public would be small, you must admit that it will cause an increase in the background level of radiation. This could have long range health effects on the American people.
2. We are opposed to this proposal because of the negative health effects it will have on steelworkers. Our members, especially those in the basic oxygen furnace, would be subjected to low-level radiation in the form of scrap, dust and fumes. Respirators are insufficient protection against permeating fumes and dust. We would be subjected to radiation caused diseases including cancer and deformed children. While you admit your reasons are to profit by "tens of millions of dollars", it is a price we are un-willing to pay. We are aware that these subsequent increases in diseases will be untraceable because the scrap will be mixed with non-contaminated scrap. Thus, the Government and the Companies will be held blameless. We suggest that you find another way to deal with this poison than attempting to subject our members to disease and death.
3. We are opposed to this proposal because it is an obvious attempt to open the doors to wider deregulation of low-level radioactive waste.

The health and safety of our members is of utmost concern to us. Therefore, we demand that this proposed rule change be withdrawn immediately.

*Don Thomas*  
Don Thomas, President  
USWA-Local 1219

DT,EA:afb



Sincerely yours,

*Eugene Askey*  
Eugene Askey, Chairman  
Safety Committee  
USWA-Local 1219