



Letter to the NRC re: Release of Radioactively Contaminated Materials

November 2, 1999

Secretary
US Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemaking and Adjudications staff

RE: Nuclear Regulatory Commission 10 CFR 20 Release of Solid Materials at Licensed Facilities:
Scoping Process

Dear Secretary:

Vast quantities of radioactively contaminated materials have been and will be generated as a result of the production of nuclear weapons, clean-up of the nuclear weapons complex, and operation and [decommissioning](#) of nuclear reactors. These materials include radioactively contaminated metals, like nickel and copper.

In the past, radioactively contaminated metals have been released from US nuclear facilities into the marketplace, both domestically and abroad. The US Nuclear Regulatory Commission is now considering whether to issue a rule that would officially permit the release of radioactively contaminated materials from nuclear facilities into the general marketplace, and if so, at what level.

Releasing radioactively contaminated materials into general commerce poses needless risks to human health. Moreover, allowing the release of radioactively contaminated materials from Department of Energy facilities could be especially deleterious given the Department's poor technical track record of measuring releases of [radioactivity](#) and of record-keeping (see [Science for Democratic Action vol. 5 no. 3](#) (October 1996) and [vol. 6 no. 2](#) (November 1997), enclosed).

IEER opposes the release of radioactively contaminated materials into general commerce. Such releases should be immediately halted.

Thank you for considering our comments and including them in the official record.

Arjun Makhijani
President

Lisa Ledwidge
Outreach Coordinator and Editor, Science for Democratic Action

cc: Potential roundtable participants of the NRC Workshop on Control of Solid Materials, November 1-2, 1999, Rockville, Maryland