



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

September 11, 2000

Mr. Bill Richardson
Secretary of Energy
United States Department of Energy
1000 Independence Ave., SW
S-1, 7B-252-FORS
Washington D.C.

Dear Secretary Richardson:

Subject: Opposition to your Decision to Suspend Scrap Metal Sales Under NRC Reg Guide 1.86

At its meeting on September 6, 2000, the Oak Ridge Site Specific Advisory Board (ORSSAB) voted to release the following position statement to the U.S. Department of Energy - Oak Ridge Operations and the local news media:

The Oak Ridge Site Specific Advisory Board wishes to publicly go on record as being strongly opposed to the Secretary of Energy's July 13, 2000 decision to place a moratorium on the commercial recycle of the Department of Energy (DOE)-owned scrap metal with relatively low levels of surface radiological contamination that could otherwise be released under U.S. Nuclear Regulator Commission's (NRC's) Reg Guide 1.86.

Scrap metal objects with low levels of radiological contamination on external surfaces have been safely released into the commercial metal recycle markets from both DOE and NRC-controlled operations for many years. There is no scientific evidence that would suggest that any adverse human health or ecological effects can be attributed to the commercial recycle of these materials.

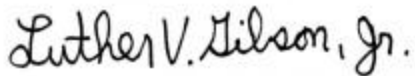
Metal recycling, including scrap that can be recycled under Reg Guide 1.86, slows the rate of depletion of our nation's mineral natural resources and helps prevent the environmental and ecosystem impacts associated with the mining and processing of virgin metal ores.

Without parallel decisions by NRC and NRC-agreement states to also forbid such recycle practices in the nuclear industry and other private sector applications, and in the absence of any government policy limiting the import of metal materials and products containing residual levels of radioactivity from foreign countries, DOE's moratorium is meaningless from the public policy standpoint.

Under this moratorium, DOE-owned materials that could otherwise be returned to commerce and generate revenue will now have to be managed by DOE as low level radioactive waste and, in some cases, chemically hazardous waste. The waste management and disposal costs that will ultimately have to be borne by the taxpayers to abide by the moratorium will be significant. Neither the funds expended nor the lands that will have to be displaced for waste disposal purposes will accrue any measurable long-term benefits to the people of the United States.

In summary, we believe that the technical and economic justification for the decision has not been substantiated. We sincerely hope that the Secretary will reconsider this decision.

Sincerely,



Luther V. Gibson, Jr.
Chair

Cc: Martha Crosland, Director of the Office of Intergovernmental and Public
Accountability, DOE-HQ
Leah Dever, Manager, DOE-ORO
Susan Gawarecki, Executive Director, Oak Ridge Reservation Local Oversight
Committee
John Hankinson, Regional Administrator, EPA Region 4
Carolyn Huntoon, Assistant Secretary for Environmental Management, DOE-HQ
Earl Leming, Director, Tennessee Department of Environment and Conservation,
DOE-ORO Local Oversight
Rod Nelson, Assistant Secretary for Environmental Management, DOE-ORO