

NRCREP - Comments on 71 FR 130:38675-38676, July 7, 2006

From: "Karen H. Prather" <prathers@worldconnx.net>
To: <NRCREP@nrc.gov>
Date: 09/07/2006 11:16 PM
Subject: Comments on 71 FR 130:38675-38676, July 7, 2006

TO: Chief, Rules and Directives Branch
Mail Stop T6-D59
US Nuclear Regulatory Commission (US NRC)
Washington, DC 20555-0001
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Fax 301 415 7257 Attn: Ryan Whited

Please see attached comments.

Karen H. Prather, Chairperson
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71 FR 38675

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Comments on 71 FR 130:38675-38676, July 7, 2006
Nuclear Regulatory Commission's Low-Level Radioactive Waste Program

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From: Concern About Radiation In the Environment (CARIE)
Tuesday, September 6, 2006

In the 1980's, CARIE drafted a "low-level" waste disposal ordinance that was adopted in many Pennsylvania communities as well as in other states. Our objective was to empower communities to require LLRW management and disposal practices that would safeguard the people and their environment from radioactive contamination. It is evident that the NRC LLRW program favors the needs of the nuclear industry, the licensees, and the generators of radioactive waste. It is imperative that states retain their authority to impose greater protection than provided by the NRC.

Listed below are our additional comments to the NRC on 71 FR 130:38675-38676, July 7, 2006:

1. Reclassify as higher-level all radioactive waste that is hazardous longer than the 100 year institutional control period required for "low-level" radioactive waste sites.
2. Increase not reduce institutional and regulatory control of radioactive waste. We are opposed to the declassification of high-level radioactive waste from reprocessing to Waste Incidental to Reprocessing and also oppose a new category of low radioactivity or low activity wastes that would then not require licensed regulatory control.
3. Deposit no depleted uranium in "low-level" radioactive waste sites.
4. We oppose risk-informed regulation for reactor and material programs that were adopted as part of the NRC's strategic rebaselining. It is important to evaluate the risks of ionizing radiation at low doses and in combination with other pollutants. Include environmental damage, non-cancer and other health effects in risk assessments.
5. Minimize human exposure from nuclear waste environmental releases.
6. Minimize generation of radioactive waste and fully regulate what is generated.
7. Do not add categories that are below regulatory concern.
8. Do not legalize contamination and leakage.

9. Tighten existing regulations to isolate radioactive waste for its hazardous life, if necessary, by retrieval and recontainment.
10. Public records should be kept on waste generated and its storage, disposal and final destination.
11. Isolate radioactive wastes in radioactive waste facilities. Do not mix with other forms of waste which would complicate the health and safety risks.
12. Permanently reject the proposed rule that would have generically deregulated nuclear waste.

Karen H. Prather

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