

7/7/06
71 FR 38675
8

From: <Thinkcivic@aol.com>
To: <NRCREP@nrc.gov>
Date: Sat, Sep 2, 2006 8:56 AM
Subject: Comments on 71 FR 130:38675-38676, July 7, 2006 NRC LLRW prog

Chief, Rules and Directives Branch
NRC

The whole reason for the existence of the Nuclear Regulatory Commission is to REGULATE nuclear matters and materials FOR THE PROTECTION OF THE PUBLIC, not to play word games and statistics games which in fact lessen our protection. The whole issue of regulation of "low level" waste should be looked at from the viewpoint of public protection, not from the viewpoint of what is convenient or profitable for the nuclear industry.

There are a few specific points I would like to make with regard to 71 FR 130.38675-38676, July 7, 2006:

1. The current definition of "low level" waste is inaccurate. Some materials now classified as "low level" are HIGH RISK., and can give a lethal dose in less than an hour!

I oppose any effort to reduce institutional or regulatory control over radioactive waste. Long lasting wastes such as DU should be isolated and regulated in facilities designed for their long life. The threat which such wastes pose to human health is significant and must not be ignored.

2. I oppose so-called "risk-informed regulation" for both the reactor and materials programs. NRC is denying the risks of ionizing radiation at low doses and in combination with other pollutants. This is a truly ignorant (or cynical) approach --favorable to the nuclear industry, not to the public health. The "risk" approach has the effect of pretending that public health, particularly that of those most vulnerable, is not the main concern. "Risk" assessments don't have the power or intent to incorporate non-cancer and other health effects or environmental damage. The NRC should adopt, for both predictive and retrospective assessments, a new method of damage analysis based on precaution.

3. I support NRC development of regulations that have a goal of preventing release and exposure rather than legalizing contamination and leakage. I support continued state authority for greater protection than NRC regulation provides. As of 2006, 10 CFR 61 still allows unlined soil trench burial of radioactive wastes and leakage from the licensed burial sites!

The NRC should minimize public exposures and environmental releases of radioactivity from nuclear waste. This translates to mean preventing unnecessary generation of radioactive waste and fully regulating that which is generated. It means regulating with a goal of keeping track and control, which is something the NRC seems to forget.

How has the NRC (or the nuclear industry) managed to corrupt the goal of the NRC --a goal of preventing exposures, not setting new, higher, or more "flexible" allowable contamination levels or declassification of wastes to meet lesser protection criteria? It is mind-boggling how backwards much of the operation of the NRC has become!

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4. The NRC's efforts and tendency toward generically deregulating radioactive waste and materials are antithetical to the interests of the public. How many times must this obvious truth be repeated?

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