

Rulemaking Comments

PR 61
(76FR24831)

June 20, 2011 (11:15 am)

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Sent: Friday, June 17, 2011 7:27 PM
To: Carrera, Andrew; Gallagher, Carol; Rulemaking Comments
Subject: Docket ID NRC-2011-0012 nrc part 61 comments will not go through to rulemaking.comments@nrc.gov

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Docket ID NRC-2011-0012 nrc part 61 comments

Thank you for requesting my comments on proposed Part 61 changes. In general, I would recommend that:

- * intruders include deliberate and inadvertent intruders,
- * flora and fauna and nearby population/transportation corridors of the environment be part of the PA,
- * container integrity be analyzed over time,
- * remote sensors including temperature, moisture and radiation detection be required below and around the disposal site,
- * and finally, TO REDUCE AMBIGUITY, differentiate between depleted uranium that is from the front of the nuclear fuel cycle (non-irradiated) and depleted uranium that is from the back end of the fuel cycle (irradiated). The former CEO of EnergySolutions, Steve Creamer, got on the radio (google red meat radio and steve creamer and depleted uranium) and implied that the Depleted Uranium in 1000 barrels at Clive, Utah was safe enough to grow vegetables in! The barrels contain nuclear weapons waste or irradiated Depleted Uranium which is not like the stuff we shot into Kosovo farmland.

I have the following specific comments:

61.2 inadvertent intruders should be intruders period. You shouldn't bury anything that would be valuable to a terrorist and expect that it won't tempt someone to dig it out or explode it out.

61.7 b 1 should include flora and fauna of the environment (insects, deep rooted weeds (like wild morning glory with 18 ft roots and crickets that could be eaten by birds); even bacteria.

61.7c should include prevention of disturbing the integrity of the buried material by persons, flora or fauna.

61.7c5 should say: Waste that WILL DECAY to levels that DO NOT present a hazard to an intruder AFTER 100 years is designated as Class C waste.

61.7d (it says d4) should include that state or federal government should ensure security of site for 500 yrs.

61.42 inadvertent intruders should include all intruders inadvertent or deliberate (appropriate in the case of potential interest in Plutonium theft which could be released to general population).

61.44 should analyze the secondary effects of climate/environmental changes such as nearby bodies of water rising and creating new groundwater effects, subsidence/fissures developing from groundwater use, etc (which is common around Utah).

61.56 minimum physical characteristics should include container/s which may not be viable at 100 years but you check for container viability at 300 years for other waste.

61.59 institutional control period is 100 years but Plutonium 240 increases activity five times in 100 years and there is a significant danger of irradiated Depleted Uranium's Plutonium tempting excavation and removal for good or bad purposes.

61.55 again, to reduce ambiguity, Depleted Uranium term should not be used for different material. Depleted Uranium is used by the military (shooting up the West Desert in Utah and farmland in Kosovo), used in aircraft counterweights and in sailboat ballast. It should not be confused with defense waste or reprocessed nuclear fuel rods. More specifically, fuel rods should not be allowed to be classified as Class A whether they are irradiated, not used, used, or reprocessed.

It just makes the nuclear industry look like we don't know what we are doing.

On the table on pg 40, what is U308 if not a typo?

Thank you again for your time and consideration.

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