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Low-Level Radioactive Waste Regulatory Program

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General Comment

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See attached responses to Docket ID NRC-2014-0080 (Low-Level Radioactive Waste Regulatory Program)

Attachments

Comments on Docket ID NRC-2014-0080

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Add= *m. Wong (mewh)*

Low-Level Radioactive Waste Regulatory Program

Docket ID NRC-2014-0080

"The NRC staff is requesting that persons consider and address the following questions as they develop and provide their remarks: Regarding the Current National LLRW Disposal Landscape

1. What changes are anticipated in the LLRW area with regard to safety, security, and the protection of the environment?"

As Low Level Radioactive Waste is generally not truly low level by any stretch of the imagination, but rather comprised of long-lived, dangerous radionuclides, albeit in slightly smaller quantities, they have been continually accumulating in the environment. Unless no leakage is allowed, they will continue to do so until a tipping point is reached. How can over a billion becquerels per kilogram of plutonium be considered "low level"?

There will be a tipping point where the impacts can no longer be withstood by life. If you have children and love them or believe in an afterlife, and if you don't wish to die a painful death from cancer or see loved ones do so, then you must cease and desist from allowing leakage, and cease and desist from being lackeys of the nuclear industry. LOW LEVEL IS A MISNOMER WHICH SHOULD APPLY ONLY TO RADIONUCLIDES WITH HALF-LIVES OF SECONDS, MINUTES OR HOURS.

You need to change to using becquerels per kg or becquerels per pound. Using curies, nanocuries, etc. appears an attempt to confuse and deceive and to make the dangers look smaller. A curie is 37 billion becquerels, i.e. radioactive disintegrations per second. Also, you need to correct the NRC library site, which due to a formatting error classifies transuranic waste too radioactive for WIPP as low level waste. <http://www.nrc.gov/reading-rm/doc-collections/cfr/part061/full-text.html>

"2. As a result of those changes, what activities should remain on the list of proposed activities developed during the 2007 Strategic Assessment, and are these activities appropriately prioritized in order to ensure safe and secure LLRW disposal, improve the effectiveness of NRC's regulations, and assure regulatory stability and predictability while allowing flexibility in disposal options? What new activities should be added?"

There is no room for "flexibility". The waste must be kept in truly engineered and easily monitored storage facilities. Any leakage must be promptly stopped.

Earth, clay, and membranes do not constitute engineered barriers. There need to be space-age, or more advanced materials used. All underground structures leak, too, without maintenance-pumping. Concrete has a limited lifespan, especially underground. Even beavers and primitive man maintain structures.

The waste must be kept in an accessible and monitored bunker-vault. Accessible does NOT mean digging it up if a leak is found. Accessible means routinely accessible.

"Regarding the Current LLRW Disposal Regulatory System

1. As a result of the new national landscape, what are your key safety concerns relative to LLRW disposal?"

Key safety concern is that rather than tighten the waste rules that you will weaken them. Radioactive waste is not safe. Especially transuranics will build in the body over a lifetime, causing cancer and genetic damage. Plus uranium is damaging to the kidneys. Will you donate your kidneys and go on dialysis yourself?

As Low Level Radioactive Waste is generally not truly low level, but rather comprised of long-lived, dangerous radionuclides, albeit in slightly smaller quantities, they have been and will be continually accumulating in the environment, unless NO leakage is allowed. There will be a tipping point where the impacts can no longer be withstood by life. If you have children and love them, or believe in an afterlife, and if you don't wish to die of a grisly case of cancer, or see loved ones do so, then you must cease and desist from allowing leakage, and cease and desist, from being lackeys of the nuclear industry.

Low Level is a misnomer which should apply only to radionuclides with half-lives in minutes or hours or possibly days. And, I don't mean using that to cheat either, by counting years in hours, minutes, days, etc.

"2. What vulnerabilities or impediments, if any, are in the current regulatory approach toward LLRW disposal in the U.S. that need to be addressed in order to strengthen the NRC's ability to ensure safe and secure LLRW disposal, improve the effectiveness of its regulations, and assure regulatory stability and predictability while allowing flexibility in disposal options?"

RULES MUST BE STRICT AND ALLOW NO LEAKAGE. THERE IS NO ROOM FOR "FLEXIBILITY". All waste should be in good quality containers, in a solid bunker-like environment that can be readily entered continually for monitoring.

"3. What actions could be taken by the NRC and other Federal and State authorities, as well as by private industry and national scientific and technical organizations, to optimize management of LLRW? Which of the following actions are most likely to yield benefits?"

There is no room for "optimizing management" unless you mean setting up identical bunkers with identical containers and monitoring in identical ways - Fordism. But, if you mean cutting corners on quality or on waste classification, there is no room for cutting corners in radioactive waste management.

All radioactive materials should be tracked from start to finish to ensure that there is no cheating.

4. No, no, no, "Disposal options for low-activity waste/very low level waste"; No to this idea of nuclear waste to public landfills and into public-consumer products. All radioactive waste must be properly stored, unless it has a half-life of minutes, hours, or days, in which case it should be safely held until it is no longer radioactive.

"5. What unintended consequences might result from the potential changes identified in response to questions 3 and 4?"

If you do it your way, like the UK, and further deregulate and give the radioactive investment bankers their heart's "desire", to quote the NRC's Melanie Wong, then the world will be increasingly contaminated by radiation and eventually all life will perish.

If you do it my way, the right way, then those making proper containment, and construction companies building proper bunkers, stand to benefit and profit. However, your banking friends will be unhappy, because nuclear waste may no longer be a lucrative Wall Street style money making machine.

The only optimistic scenario is to stop making the waste and to invest in safe storage facilities. And that you all turn whistle blowers.

CONSISTENT TREATMENT? STORE ACCORDING TO LONGEVITY OF RADIONUCLIDES, ACCORDING TO TYPE, NOT SIMPLY ACCORDING TO SUPPOSED BECQUERELS. WHERE IS THE WEIGHTING FOR ALPHA RADIONUCLIDES, SUCH AS PU 241 WHICH BECOMES AMERICIUM 241?

No one wants the radioactive waste because they know that it is not properly monitored. If you and the EPA and the DOE did your jobs properly and had it stored and sealed and monitored properly, instead of intending for it to leak, then there would be no fear of nuclear waste. While the redundancy of the NRC, EPA and DOE appears wasteful, if the NRC, EPA, DOE did their jobs such a redundancy could be good. But, since all three fail to protect the citizens and environment, it is simply wasteful redundancy. Apparently Switzerland temporarily stores its waste in neatly numbered and properly spaced containers with enough room for a fire truck to enter the premises. The US certainly has more space than Switzerland, so that there is no reason that a facility could not be properly constructed, except that the US nuclear waste industry is for profit. The nuclear waste industry must be nonprofit. There is no room for investment bankers and profit-making in radioactive waste. WIPP was even done on the cheap so designed to fail. The waste rooms should not be backfilled; the containers should have been neatly stacked, spaced, and numbered. Expected implosion of the facility has to lead to explosions. It may or may not have been the cause of the problem but it will be. It's the most basic principle - pressure is inversely related to volume. Collapse of the room leads to even more pressure built up.

IF YOU CONTINUE TO DEFEND THE NUCLEAR INDUSTRY AND NUCLEAR WASTE INDUSTRY I DEMAND THAT YOU DONATE BOTH YOUR KIDNEYS TO THOSE WHOSE KIDNEYS HAVE BEEN DAMAGED BY URANIUM AND YOU GO ON DIALYSIS.

The CHR on Low Level Waste is written such that for every rule there is an exception or loophole. NO EXCEPTIONS; NO LOOPHOLES. NO PUTTING RADIOACTIVE WASTE IN LANDFILLS! Also, your job is to REGULATE the nuclear industry and not to see what it desires and especially not what former investment bankers running nuclear waste dumps for profit "desire". I quote Melanie Wong of the NRC from last March:

"THE DESIRE OF THE INDUSTRY FOR GREATER FLEXIBILITY AND RELIABILITY IN LLRW DISPOSAL OPTIONS". How about what the citizens of this country desire? I am certain that all desire clean air, clean water, safe food? Frankly I do NOT care what the industry thinks.

My household did not receive notification of this so-called public hearing last March. You cannot call that a public hearing if citizens were not properly notified on a household by household basis. All of the nuclear waste dump companies appear invited as "panelists".

The leak rates allowed and proposed are totally unacceptable. There should be no proposed leaking. Nuclear waste needs to be in the not for profit sector. We must love the waste, all while stopping to make it, and take care of it properly because it will be with us forever.

Does your proposal to keep the waste safe for 1,000s of years mean that it will be monitored in accessible bunkers? That is the only way.

"1. Based on your observations of what works well and not-so-well, domestically and/or internationally, with regard to the management of radioactive and/or hazardous waste, what actions can the NRC and other Federal regulatory agencies take to improve their communication with affected and interested stakeholders?"

STORE THE WASTE NEATLY AND NUMBERED IN BUNKER STYLE FACILITIES WITH ROOM FOR ACCESS BY A FIRE TRUCK BETWEEN ROWS

"Potential Alternative Futures

The following revised disposal scenarios are proposed for incorporation in the updated Strategic Assessment. Are there recommendations to improve the proposed disposal scenarios?

Optimistic' Scenario Assumptions":

That you will protect the citizens of this country and have nuclear waste be stored as safely as feasible, with no leaks, and stop acting as lackeys of the nuclear and nuclear waste industry. That you will become a whistle-blower. That nuclear power will stop, so that there is no more waste generated.

"Pessimistic Scenario Assumptions":

That you and the nuclear industry will continue on, business as usual, with your buddies and that more and more people will die grisly deaths from cancer and that all life will vanish from the earth.

Even if you are being bribed, which I doubt, money can't buy your health, or that of your family, and money won't get you to heaven. If you are going to do the will of the nuclear industry, backslapping each other, like you apparently do, is too cheap to prostitute your soul and life for!