

RulemakingForm2CEM Resource

From: Thel Ferguson [justatestinhere@fastermac.net]
Sent: Friday, July 17, 2015 5:34 PM
To: RulemakingComments Resource
Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

Radioactive releases and exposure to humans and other species must be prevented, not increased. I oppose the proposed 10 CFR 61 changes and ask the NRC to make changes that will provide greater isolation of waste.

I personally reject and ask that you remove the following provisions in your proposal...

Remove all provisions that would allow nuclear waste to go to regular trash or other unregulated locations and into commercial recycling for consumer goods. This approach has been consistently rejected by the American public and explicitly by Congress in the 1992 Energy Policy Act. Delete the existing "§ 61.6 Exemptions" and the proposed addition to "§61.7 Concepts" that would allow deregulating, exempting and releasing radioactive waste and materials from radioactive regulatory control.

Reduce radiation releases on behalf of public safety. The goal should be to prevent ALL releases. Reject the proposed change from the current allowable public dose of 25 millirems/year to the higher 25 millirems EDE, 100 millirems EDE, 500 millirems EDE or even higher per year.

Remove all provisions that would allow dump operators to do their own "Performance Assessments" and produce "Safety Cases" to claim they can put more kinds of radioactive waste and longer-lasting nuclear waste in shallow land burial trenches. This constitutes an obvious conflict-of-interest issue since operators would have a vested interest in favorable outcomes of such assessments.

Allow states to continue setting stricter, more protective standards than the NRC. Remove the "Level B" compatibility requirement.

Radioactive materials that remain hazardous for 100 years or more should be kept OUT of burial grounds. Simply labeling various time periods (compliance, performance, protective assurance, etc.) and assigning increasing allowable doses does not protect anyone; it simply makes it legal to pollute.

Any NRC rules enacted should provide the public - and the environment on which we all depend for life itself - with increased, not decreased levels of safety.

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