

## RulemakingForm2CEm Resource

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**From:** Beth Jones [bj1@direkt.at]  
**Sent:** Friday, July 17, 2015 5:52 PM  
**To:** RulemakingComments Resource  
**Subject:** [External\_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

I strongly oppose the proposed 10 CFR 61 changes to radioactive waste regulations and I urgently call on the NRC to make changes to ensure much greater isolation of waste.

Radioactive releases and exposure to humans and other species must be prevented, not increased. Anyone who is following the spike in strange mutations and cancer illnesses in the areas around the Fukushima site (like the ones that followed the Chernobyl disaster) knows that we desperately need LESS radioactive contamination, not fewer regulations on and protections from it.

I especially demand that you delete the following outrageous provisions from your proposal:

No deregulation of radioactive waste waste:

Remove all provisions that would allow nuclear waste to go to regular trash or other unregulated places or into commercial recycling into consumer goods. (Who in the Hell came up with this idiocy?!) This willfully & recklessly negligent 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 blithely allow deregulating, exempting and releasing radioactive waste and materials from radioactive regulatory control.

No increase in radiation to the public:

Reduce radiation releases: 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 more per year. Such harmful "contamination creep" is also a display of an unconscionable willingness to subject our communities and environment to deadly contamination in perpetuity. Whoever is advocating for this idiocy needs to be summarily FIRED and sent to Fukushima to feel the effects of radiation sickness for themselves. They do not deserve to live in a healthy environment if they're willing to force everyone else to face increasing contamination.

No "black box" Performance Assessments by dump operators:

Another no-brainer -- Remove all provisions that would allow dump operators to do their own "Performance Assessments" and make "Safety Cases" to claim they can put more kinds of radioactive waste and longer-lasting nuclear waste in shallow land burial trenches. This presents an obvious conflict-of-interest issue, as operators would have a vested interest in a favorable outcome of such assessments.

No preemption of state's authority:

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

Radioactive materials 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. If consumers intuitively understand that, what the hell is the NRC doing, pretending it isn't true?

It's high time we reject nuclear power in favor of CLEAN energy sources, which are already outstripping this inherently dangerous industry.  
Enough is enough. No more nukes, no more radioactive waste.

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