

RulemakingForm2CEM Resource

From: susan michetti [sunlightrising@gmail.com]
Sent: Friday, July 17, 2015 6:13 PM
To: RulemakingComments Resource
Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

I oppose the proposed 10 CFR 61 changes and ask NRC to make changes in the direction of greater isolation of waste. Radioactive releases and exposure to humans and other species must be prevented, not increased. The recent environmental exposures from accidents and negligence are unacceptable. Such travesties that threaten human health and human reproduction would not exist if regulators were competent and seriously protecting the public from unnecessary and unacceptable risks. I resent being in your field experiments that threaten my life, and yes I do have unnatural cells in my thyroid that likely came from the major cause of thyroid cancer---exposure to radioactive materials. This is a medical fact. The only known cause of thyroid cancer which has reached epidemic stages in US medicine is radioactive exposure. We need to be protected from thyroid cancer, still born births, and leukemia as well as molecular membrane damage that occurs with all exposures.

I especially reject and ask that you remove the following provisions in 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. 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. We need stricter regulation of rad waste from transport rules to storage.

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. The public should not be exposed to these type of irrational and irresponsible field experiments.

No "black box" Performance Assessments by dump operators:

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. This is insane and irrational--something that should not be done with radiative materials ever. If you can't regulate properly, then we need to shut all nuclear usage down as humans prove themselves incapable of rational and logical control of the most dangerous substances on earth.

No preemption of state's authority:

Allow states to continue setting stricter, more protective standards than NRC. Remove the "Level B" compatibility requirement. It is antidemocracy to interfere with people's regulation to be safer, especially when you propose unsafe regulations such as this one.

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.

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