

RulemakingForm2CEM Resource

From: John Gilpin [john.b.gilpin@gmail.com]
Sent: Friday, July 17, 2015 7:52 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 instead 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.

I especially reject and ask that you remove the following provisions in your proposal:

No deregulation of radioactive 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. Those practices have 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.

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 higher doses EDE.

No "black box" Performance Assessments by dump operators:

Remove all provisions that would allow dump operators to do their own "Performance Assessments" and to make "Safety Cases" claiming they can put more kinds of radioactive waste and longer-lasting nuclear waste in shallow land burial trenches. Such provisions present 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.

Your job is to protect the public, and the public depends on you to do that job faithfully and well. It is not too much to say that your honesty and competence crucially affect the human future.

John Gilpin

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