

RulemakingForm2CEm Resource

From: Ruth Shane [ruthshane@aya.yale.edu]
Sent: Friday, July 17, 2015 8:02 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.

I especially reject and ask that you remove the provisions in your proposal that allow deregulation of some radioactive waste. These include:

1) All provisions that would allow nuclear waste to go into 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.

2) Especially, 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.

There should be NO increase in radiation to the public. Rather, your aim should be to reduce radiation releases with the ultimate goal of preventing all releases.

I urge your to 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.

There should be 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.

There should be 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 proposed changes will weaken radiation protection standards. Your mandate is to strengthen those standards to protect the citizenry, environment and wildlife of the United States of America.

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