

RulemakingForm2CEM Resource

From: Shireen Parsons [pachamama3@gmail.com]
Sent: Friday, July 17, 2015 8:37 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 expect 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.

You must 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 rejected consistently 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 must 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.

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.

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 must be kept out of burial grounds. Simply labeling various time periods (compliance, performance, protective assurance, etc) and assigning increasingly allowable doses does not protect anyone--it simply makes it legal to pollute.

Shireen Parsons
1365 Kennedy St. NW #508
Washington, DC 20011

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