

RulemakingForm2CEm Resource

From: Gayle Janzen [cgjanzen@comcast.net]
Sent: Friday, July 17, 2015 11:55 PM
To: RulemakingComments Resource
Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

Is the NRC trying to kill us off because your latest proposal sure seems like it. How exactly is deregulating nuclear waste so it can be disposed of in regular trash, recycling or even consumer products good for our health? Wow, your refusal to actually deal with your toxic byproduct is extremely frustrating. 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 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. Upping the allowable limits of exposure will only cause more people to get sick and die. You really need to go back to the drawing board and actually come up with a plan that will make us safer than we are now, not make our environment even more toxic and polluted.

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 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 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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Federal Register Notice: 80FR16081,NRC-2011-0012
Comment Number: 1493

Mail Envelope Properties (545295519.3181.1437191715248.JavaMail.tomcat)

Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID
NRC-2011-0012
Sent Date: 7/17/2015 11:55:15 PM
Received Date: 7/17/2015 11:55:15 PM
From: Gayle Janzen

Created By: cgjanzen@comcast.net

Recipients:
"RulemakingComments Resource" <RulemakingComments.Resource@nrc.gov>
Tracking Status: None

Post Office: vweb69

Files	Size	Date & Time
MESSAGE	2689	7/17/2015 11:55:15 PM

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