

RulemakingForm2CEM Resource

From: Sasha Pyle [sasha@visiblearts.com]
Sent: Saturday, July 18, 2015 11:12 AM
To: RulemakingComments Resource
Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

As a New Mexican who has been a citizen advocate in nuclear issues for over 25 years, I strongly oppose the proposed rule changes. Look what happened at WIPP-- an accident and release caused by poor waste characterization, weakened regulations, smugness and human error.

Please remove all provisions that would allow waste to go to unregulated places or into commercial recycling into consumer goods. Years ago, Senator Al Gore, Sr. negotiated what he thought was a sweet deal at Oak Ridge to sell radioactive nickel to industry, and it ended up in kids' braces and toaster ovens. Industry has no conscience. That's why we have to have real REGULATION.

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.

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.

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. Aboveground monitored retrievable storage in hardened casks is the only way to keep groundwater protected. 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. The public is WATCHING.

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