

## RulemakingForm2CEM Resource

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**From:** Dr. Lewis Patrie [patric.wncpsr@main.nc.us]  
**Sent:** Saturday, July 18, 2015 12:44 PM  
**To:** RulemakingComments Resource  
**Subject:** [External\_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

The NRC appears to have failed to take into account that the mutagenic and carcinogenic effects of low level radiation have been well substantiated for decades. For that reason the NRC should make changes in proposed 10 CFR 61 changes to ensure greater isolation of waste. Radioactive releases and exposure to humans and other species must be prevented, not increased.

You must eliminate 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. You must eliminate 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 must be no increase in radiation to the public. Your 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.

Dump operators must not be entrusted 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. Such conflict-of-interest opportunities are unacceptable.

States should be continued to be allowed to set 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.

Ever increasing human exposure to man made radioactive sources demonstrates lack of wise decision making and disregard for the health and welfare of earth's inhabitants.

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