

RulemakingForm2CEM Resource

From: Beverly Foster [hwlyfstr@aol.com]
Sent: Saturday, July 18, 2015 5:06 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 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. 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.

These weakened rules would let the public be exposed to a lot more radioactivity than is currently allowed by adopting the "updated" radiation regimen called EDE (Effective Dose Equivalent (EDE) allows more radioactivity per millirem for many radionuclides; we opposed this when NCR adopted it in other parts of its regulations and oppose incorporating it here for the same reasons). Allowable doses to the public would be raised from the existing 25 millirems a year to 25, 100, 500 or more millirems EDE per year. Of course, the NRC continues to ignore research that shows radiation causes even more cancer and cancer deaths in women and children than men and threatens the reproductive phase of our life-cycle.

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.

TOTALLY UNACCEPTABLE.

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