

RulemakingForm2CEm Resource

From: Theresa Kardos [Terrykardos@aol.com]
Sent: Saturday, July 18, 2015 5:12 PM
To: RulemakingComments Resource
Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

As an environmental educator and field biologist, a parent, and citizen who cares deeply about the health of our planet and all its inhabitants, I am writing to oppose the proposed 10 CFR 61 changes and ask the 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:

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.

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.

In summary, I oppose any regulations that become less protective of human health and the environment than they already are. Any rule changes should lead to higher protective standards, not increased radiation exposures. These days many people - myself included, since I am a breast cancer survivor - face radiation exposure somewhat routinely as we undergo more and more diagnostic tests employing radiation, and a growing percentage of us undergo radiation therapies as we battle cancer. The last thing we need is increased exposure from dumps of radioactive material near our communities.

Thank you for considering my comments.

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