

RulemakingForm2CEM Resource

From: Charles Brexel Sr. [cbrexel@aol.com]
Sent: Monday, July 20, 2015 3:26 AM
To: RulemakingComments Resource
Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

I, along with more than 20.236 million members and supporters of the supporting organizations listed below and more supporting organizations, 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.

We 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.

The members and supporters of the supporting organizations for this letter include more than the listed members and supporters for each of the following organizations (more than 20.236 million total):

Credo Action - 3.5 million
Sierra Club - 2.4 million

National Audubon Society - 2 million
Natural Resources Defense Council (NRDC) - 2 million World Wildlife Fund (WWF) - 1.09 million
Earthjustice - 1 million Environment America - 1 million The Nature Conservancy - 1 million
Defenders of Wildlife - 1 million Environmental Defense Fund - 1 million Clean Water Action -
1 million Center for Biological Diversity - 825,000 League of Conservation Voters - 700,000
The Wilderness Society - 500,000 Public Citizen - 400,000 Greenpeace - 250,000 Friends of the
Earth US - 210,200 Union of Concerned Scientists - 200,000 Southern Alliance for Clean Energy
- 50,000 Physicians for Social Responsibility - 50,000 Waterkeeper Alliance - 24,000 South
Florida Wildlands Association - 17,400 Nuclear Information and Resource Service (NIRS) -
9,130 Beyond Nuclear - 8,990 Florida Consumer Action Network - 1,810

Thank you for taking the time to seriously consider our requests.

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