

From: [Phoebe Anne Sorgen](#)
To: [RulemakingComments.Resource](#)
Subject: [External_Sender] public comment re Radioactive Waste Transport Container Regulatory Revisions
Date: Thursday, January 12, 2017 3:29:07 PM
Importance: High

Esteemed Commissioners of the NRC:

Do the NRC and DoT have a dual mission with an inherent conflict of interest as does the IAEA? The IAEA is tasked with regulating the nuclear energy but also with promoting it. That is a contradiction in terms. This unacceptable conflict of interest is treacherous for individuals' health/safety and for the planet! If you, too, have that cruel conflict of interest, I beg you to follow your heart and your conscience and put people first.

All changes to the NRC's and DOT's regulations to "harmonize" them (aka making them compatible) with IAEA regulations and standards MUST better protect workers and public health, safety, and the environment, rather than prioritizing saving the industry money to boost its profits! So when/if the IAEA's regulations and standards are stronger, those must become the NRC's/DOT's. But in cases where the NRC's/DOT's are stronger, those must remain, with NRC/DOT insisting that the IAEA strengthen its standards. In addition, in all cases where regulations in another country are stronger than IAEA's and/or NRC's/DOT's, those best-practices should be used to strengthen IAEA's and/or NRC's/DOT's regulations. Regulations -- at NRC/DOT in the U.S., at IAEA internationally, etc. -- must be strengthened to the highest standards and best-practices, not weakened to the lowest common denominator.

Radioactive waste should not be transported if it is in a secure location that is not near an earthquake fault or tsunami zone or population center. It is highly corrosive, so it needs to be stored in very thick, secure containers 10 times longer than the lethal radioisotope's longest half life. In some cases, that will be for centuries or even millennia. Vitrification may be safest, encasing it in thick glass. That is expensive. Whatever course of action is safest, the nuclear industry, and its shareholders, should be made to pay for it as this industry has been highly profitable and is responsible for endangering the multitudes.

Public health and safety before profit!

Sincerely,

Phoebe Sorgen
former municipal Commissioner of Disaster & Fire Safety