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Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Requirements

Comment On: NRC-2016-0179-0005

Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Standards; Notice of Issues Paper, Public Meeting, and Request for Comment

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Comment on FR Doc # 2016-27944

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General Comment

SSR-6 (305) in covering all the bases mentions consideration of " . . . the formation of other dangerous substances that may result from the reaction between the contents of a consignment and the environment in the event of an accident." Is it not possible that these, probably chemical, reactions in various and sundry places may have reactants that are not thought of, or even known? And if a citizen were injured by an unknown product of such reactions or even a known product how would an unsuspecting doctor know how to treat such a patient? This eventuality was brought home when doctors tried to treat the victims of fracking accidents where the chemicals in question were secret. Not knowing the chemical cause of damage forestalls effective treatment.¹ Chemical reactions with unknown reagents or products indicate that transport of highly dangerous cargo is unwise and should not be done, let alone "managed" by legality and regulations.

1 Citation: Concerned Health Professionals of New York & Physicians for Social Responsibility. (2015, October 14). Compendium of scientific, medical, and media findings demonstrating risks and harms of fracking (unconventional gas and oil extraction) (3rd ed.). <http://concernedhealthny.org/compendium/> Page 143 (I emphasized the dilemma of doctors on the second to the last line below)

December 5, 2014 - A team of medical and scientific researchers, including from the Institute for Health and Environment at the State University of New York (SUNY) at Albany, reviewed the scientific evidence that

both adult and early life including prenatal exposure to chemicals from fracking operations can result in adverse reproductive health and developmental effects. These include: endocrine-disrupting chemicals potentially increasing risk for reproductive problems, breast cancer, abnormal growth and developmental delays, and changes in immune function; benzene, toluene and xylene (BTX chemicals) increasing risk for impaired sperm quantity and quality in men and menstrual and fertility problems in women; and heavy metals increasing the risk of miscarriage and/or stillbirths. Potential exposures occur through both air and water. Based on their review, the authors concluded, "Taken together, there is an urgent need for the following: 1) biomonitoring of human, domestic and wild animals for these chemicals; and 2) systematic and comprehensive epidemiological studies to examine the potential for human harm."625 Lead author Susan Nagel said in an accompanying interview, "We desperately need biomonitoring data from these people. WHAT ARE PEOPLE ACTUALLY EXPOSED TO? What are the blood levels of people living in these areas? What are the levels in the workers?"