

**From:** [Nukewatch](#)  
**To:** [Rulemaking.Comments@nrc.gov](mailto:Rulemaking.Comments@nrc.gov)  
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Secretary

**US Nuclear Regulatory Commission**

Washington, DC 20555-0001

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*Email comments to:* [Rulemaking.Comments@nrc.gov](mailto:Rulemaking.Comments@nrc.gov).

**Docket ID NRC-2016-0179**

1. Any changes to the US Nuclear Regulatory Commission's (NRC) and U.S. Department of Transportation's (DOT) regulations, to "harmonize" them with International Atomic Energy Agency (IAEA) regulations and standards, should be in the direction of better protecting worker and public health, safety, and the environment.

By "better" I mean protecting people from radiation exposure, not reducing costs for the nuclear power and weapons industry.

If the IAEA's regulations and standards are stronger than those of the NRC and the DOT (allow less radiation exposure), the IAEA's standards should be adopted by the NRC and the DOT.

If the NRC and the DOT standards happen to be stronger by permitting less radiation exposure, then they should remain unchanged -- and NRC/DOT should urge IAEA to strengthen its standards. In fact, if there are regulations in a certain country that are stronger (permitting less exposure) than IAEA's and/or NRC's/DOT's, then those best practices should be used to strengthen IAEA's and/or the NRC/DOT regulations. The regulations -- at NRC/DOT in the U.S., at IAEA internationally, etc. -- should be strengthened to the highest standards and best-practices (permitting the least radiation exposure), never weakened.

2. The US NRC's sign-off on the US Department of Energy's scheme to truck high-level radioactive liquid waste more than 1,000 miles from Chalk River, Ontario, Canada to Savannah River Site (SRS), South Carolina, shows the dangerous inadequacy of the NRC's high-level radioactive waste transportation regulations. Environmental coalition allies in the US and Canada have strenuously and legitimately challenged the recklessness of Canada's high-risk liquid waste transportation plan. Such liquid waste shipments are completely unprecedented in North America. Faulty welding -- involving equipment manufactured by Nuclear Assurance Corporation (NAC) at Chalk River -- calls into question the quality assurance and structural integrity of shipping containers for the proposed shipments being provided by NAC. The canisters appear to have been rubber-stamped as acceptable by the NRC. Waste handling failures by the DOE at SRS itself call into question the basis of NRC's approval of the radioactive liquid waste shipping scheme.

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