

**From:** [Laura Lynch](#)  
**To:** [RulemakingComments.Resource](#)  
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RE: Radioactive Waste Transport Container Regulatory Revisions (Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Requirements)

SUMMARY: The solution to the radioactive waste problem begins with shutting down the nuclear power plants that generate it in the first place. As far as the highly radioactive waste that exists and continues to be produced, putting it on trucks, train cars, and barges and transporting it across the country to a scientifically-indefensible site solely for the benefit of the nuclear power industry is an unacceptable environmental health and safety risk to our cities, our communities, our agricultural heartland, and our entire nation. Not only are there numerous safety and emergency issues to consider, there are also design deficiencies in the U.S. storage casks and shipping containers themselves. The NRC, utility owners, local, state and federal regulators must do everything they can to insure nuclear waste storage and transportation decisions are based primarily on safety concerns above all else, and not on profits.

1. With respect to any changes or revisions to the U.S. Nuclear Regulatory Commission's (NRC) and U.S. Department of Transportation's (DOT) regulations, to "harmonize" them or make them compatible with International Atomic Energy Agency (IAEA) regulations and standards, the goal first and foremost should be for the highest level of protection for workers and public health, safety, and the environment and not one of saving the nuclear industry money in order to boost its profits. If IAEA's regulations and standards are stronger then of course, those should become NRC's/DOT's. But if NRC's/DOT's happen to be stronger, then those should remain. And should that be the case, then NRC/DOT should urge IAEA to strengthen its standards. If there exists regulations in a another country that are stronger/better than IAEA's and/or NRC's/DOT's, then those best-practices should be used to strengthen IAEA's and/or NRC's/DOT's regulations. Changes or revisions to the regulations – at NRC/DOT in the U.S., at IAEA internationally, etc. – should be strengthened to the highest possible standards and best practices, not weakened to the lowest common denominator.

2. NRC's go-ahead on the U.S. Department of Energy's incredibly risky plan to truck highly radioactive liquid waste more than 1,000 miles from Chalk River, Ontario, Canada to Savannah River Site, South Carolina, U.S.A., shows that there is something seriously lacking in NRC's high-level radioactive waste transportation regulations. Highly radioactive liquid shipments are unprecedented in North American history. Faulty welding involving equipment manufactured by Nuclear Assurance Corporation (NAC) at Chalk River, calls into serious question the quality assurance and structural integrity of the jury-rigged shipping containers for the liquid shipments provided by NAC, and rubber-stamped as acceptable by NRC. Waste handling failures by DOE at SRS itself further calls into question the safety of NRC's sign off on the highly radioactive liquid waste shipping scheme. States, Counties, Municipalities along

a potential transport route for high level radioactive waste should be able to consent to or deny the plan that would lead to waste being shipped through their communities, as they would need to assess their own financial liability and the costs they could incur for expanded emergency preparedness. Radioactive waste moving through highly populated cities across the country could be targeted for sabotage by terrorists; and spent nuclear fuel is more vulnerable to sabotage or accidents during transport than in storage because there are fewer security guards and engineered barriers, and the consequences could be much higher since the waste could travel through large cities.

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