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**To:** [RulemakingComments Resource](#)  
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To whom it may concern,

One of the biggest challenges we face is not just the safety of the containers, but of the vehicles that haul them, the training of the handlers, and the training of emergency response personnel along the routes. During my time in Utah, there were several instances of container accidents involving various substances about which local emergency response personnel were uneducated. Not only did they not know what the containers held, when informed, they had no idea of how to respond. Fires involving cesium 135 are counterintuitive, and a response with water could be devastating. Rail transport goes through so many urban areas, millions of people could be affected.

Any changes to the U.S. Nuclear Regulatory Commission's (NRC) and U.S. Department of Transportation's (DOT) regulations, to make them compatible with IAEA regulations and standards, should be in the direction of better protecting worker and public health, safety, and the environment ("better" in the clear sense of protecting people and the planet, not in the Nukespeak sense of saving the industry money in order to boost its profits!). That is, if IAEA's regulations and standards are stronger, those should become NRC's/DOT's. But if NRC's/DOT's happen to be stronger, then those should remain -- and NRC/DOT should urge IAEA to strengthen its standards. In fact, if there are regulations in a certain 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. The point is, the regulations -- at NRC/DOT in the U.S., at IAEA internationally, etc. -- should be strengthened to the highest standards and best-practices, not weakened to the lowest common denominator. Particular stress should be placed on human factors.

Waste should be transported the least possible distance, ideally stored onsite in hardened containers, and above ground. Out of site is out of mind, and ?storing? waste for future handling never results in follow up. The longer the transportation routes, the greater risk to the public.

Thank you for your time,  
Eileen McCabe, Green Party of Washington