

From: [Schneekloth, Lynda](#)
To: [Docket, Hearing](#)
Cc: [Ryan A. McPherson](#); [Derek Nichols](#); elizabeth.walsh@gmail.com
Subject: [External_Sender] NRC-2017-0054
Date: Friday, May 05, 2017 9:13:19 PM
Attachments: [ATT00001.txt](#)

Dear Chair Svinicki and Commissioners,
Please find comments from the Western New York Environmental Alliance.
Thank you, Lynda Schneekloth, Advocacy Chair

May 4, 2017

The Honorable Kristine Svinicki, Chair
United States Nuclear Regulatory Commission
Washington, DC 20555

RE: NRC-2017-0054

Dear Chair Svinicki,

The Western New York Environmental Alliance is a network of over 100 environmental organizations in Western New York. We work to protect and preserve the natural heritage of our region, promote public health and environmental justice, and seek a rapid response to climate change. Our region sits on the Great Lakes and has two bridge access points: the Peace Bridge and the Lewiston Queenston Bridge, either of which can be used for commercial transport.

The Great Lakes is the largest surface fresh water body on earth and is drinking water for millions of people in both the United States and Canada. As responsible members of this region and the two nations, we should do nothing to put this water at risk.

We are writing to state our strong opposition to the export license for up to 10,000 metric tonnes of low-level radioactive waste from nuclear power to Canada – and of course, we object strongly to the import of the material in the first place. We understand that your procedures do not allow us to make comment on the importation because of the issuance of a generic license. It is unfortunate that there is no procedure for comment on this type of license. Even the Nuclear Regulatory Commission should not have the power to decide that radioactive material be allowed to enter the United States without public review. Nevertheless, we will comment on the export of the material back to Canada as that is our only avenue.

Regarding this specific license:

1. This material, produced in Canada, should be processed in Canada. There is no reason for it to enter the United States and therefore, no reason for it to be returned. As long as Canada relies heavily on nuclear power, it should take care of the entire process.
2. The transportation of any nuclear waste is very dangerous to the public because of

the possibility of an accident or even terrorist action. These shipments are unescorted and without proper advance notice to communities through which it will pass.

3. The reprocessing opens the possibility of spreading the footprint of radioactivity in a number of venues to include the 'cleaning' of the matter (what happens to the contaminated water?), through the reuse of material in consumer goods such as garden tools, automobiles, etc., which has been declared, through contamination and exposure of workers and drivers, and even to community people who may be stuck in traffic next to the trucks on a bridge. Although mostly 'uncharacterized material,' nevertheless it is stated that it will contain gama radiation, Cesium-127 and Plutonium-238, 239 and 240.

General Comment: This shipment is only the beginning of such shipments and the licensing supported by the NRC assumes that the transport of waste is 'normal' and without problem. We live in a world when accidents happen and urge your Commission's re-appraisal of moving radioactive waste around on our nation's highways and bridge. Citizens and the environmental should not be put at risk.

In summary, we request that the Nuclear Regulatory Commission reject this license so that the transport of radioactive material will not commence.

Sincerely,

A handwritten signature in black ink, appearing to be 'LS', with a long horizontal line extending to the right.

Lynda Schneekloth, Advocacy Chair
Western New York Environmental Alliance