

May 5, 2017

To: Secretary, U.S. Nuclear Regulatory Commission, Washington DC 20555-001, ATTN: Rulemakings and Adjudications Staff

Re: NRC-2017-0054: Request for a license to export radioactive waste;

UniTech Service Group, Inc.

#### Comment Letter

The Great Lakes Environmental Alliance (G.L.E.A.) is a non-profit organization working to safeguard the environmental health of the Great Lakes Basin through education and community outreach. We and other organizations signed on below have many serious and unresolved safety and health concerns directly related to the proposed export license noted above - as well as to the general license already granted by the NRC for import of these radioactive wastes.

We stand firmly opposed to both import and export of any of the 10,000 metric tons of radioactive “materials” acknowledged by letters to the various states as originating at Canadian nuclear reactor sites (and referred to in earlier documents in this matter as radioactive wastes) “...in the form of radioactive-contaminated tools, metals and other solid materials, along with incremental amounts of special nuclear material.”

These radioactive wastes would be transported by truck to various places in the U.S. including Morris, IL, Oak Ridge TN, and Royersford PA for “...segregation, survey, decontamination, unrestricted release, beneficial reuse (recovery and recycling.)” These wastes will cross at 5 U.S. locations, including Port Huron MI, Lewiston, NY, Buffalo NY, Alexandria Bay NY, and Calais, ME., with potential of return trips (which is why an export license is needed.)

We are opposed to these shipments for many reasons: the first being that now the Nuclear Regulatory Commission has to all appearances given carte blanche to these transports by truck by granting the company, UniTech Service Group, Inc. a General License, which allows them to truck these dangerous wastes through our communities without the public’s knowledge as to what is proposed to be sent, or having a chance to voice their concerns or approval, and setting precedence for countless other shipments of these dangerous radioactive wastes to be trucked through our communities. This opens the floodgates for our roads to become radioactive waste transport zones – putting at risk all communities and watersheds (including the Great Lakes watershed) on these routes, in case of any spill or accident.

So called “low-level” radioactive wastes are not benign and these are no exception. The large list of radionuclides includes: plutonium 238 and 239, neptunium 239, tritium, cobalt 60, strontium 90, as well as many other named radionuclides and also “other [unnamed] alpha-emitting radionuclides and other

[unnamed] beta-gamma emitting radionuclides". If there is an accident with spill(s) into water, or a fire with breached containment and airborne plume(s), it could prove difficult or impossible to recapture all breached radioactive wastes and could contaminate or impact the health of emergency response workers and other people nearby, whether in vehicles or not, as well as people and the environment in the path of the spill(s) or plume(s).

Also, we have serious concerns about these radioactive wastes getting into our recycled metal supplies, and into other recycled materials in the U.S., since Tennessee, (for example), has clearance levels that allow some amount of radioactive materials to be considered "below regulatory concern". Since these radioactive materials or wastes are targeted for "recycling and reuse" then it is easy to see how small amounts of radionuclides that are known to be harmful to humans and the environment – some for the short-term and others for the very long-term – can or could be released into these recycled materials streams. This is completely unacceptable and U.S. citizens have strongly rejected all former attempts by the U.S. NRC and DOE to deregulate so-called "low" level radioactive wastes to what is called "below regulatory concern".

Many of these radionuclides concentrate in the food chain (in algae, in freshwater fish, and other plant and wildlife.) Some of them concentrate thousands of times, some much more than that, (just like DDT) with serious health consequences especially to those highest on the food chain, such as birds and humans. Moreover, women and children are especially vulnerable to such radiation. And if radioactive materials lodge in a person's body, (in bone, or muscle, for example) then they continue irradiating the cells nearby for as long as they remain lodged in the body, and as long as their many half-lives allow. Some of these radionuclides are bone-seekers or seek out various organs and replace other vital cell materials.

We also are opposed to the various cleaning processes that these materials or wastes would be subjected to, as that allows potential exposure to workers and allows contamination of water and air in the areas these processes take place. This whole proposal seems simply to be a scheme to spread Canada's radioactive footprint with the aid of the U.S. NRC. and makes no sense at all. We also are concerned that most communities that these wastes would be trucked through, have no awareness nor voice in this matter. We call on the U.S. NRC to deny this export license in order to protect the health, safety and welfare of people and the environment.

For all future generations,

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