

Comments of  
Nuclear Information and Resource Service and  
Chesapeake Physicians for Social Responsibility  
Oregon Physicians for Social Responsibility

January 25, 2017

RE: Docket NRC 2017-0222 Areva Import IW009/03 and Export XW015/01 Permits for Uranium from Germany through Baltimore to the State of Washington, disposal in the US and return of noncombustibles

Our organizations oppose the transport of uranium/uranium wastes from Germany to the US and back. We have concerns about the wisdom, efficiency, safety and security of transporting uranium wastes from Germany to the US by ship, through Baltimore, across the US by land and the burning of uranium. Our concerns include both routine operations and releases and accidental releases. There is no safe level of radiation exposure and it appears that these shipments bring no benefits to the those bearing the exposure risks. Embedded in the docket is the creation of middle level corporation continuing or layering foreign ownership and control of the nuclear facilities and activities involved. We question NRC trusting that certain information will only be known to US citizens within the foreign owned corporation running the facility and transporting waste across the US.

As organizations with residents along the transport routes and downwind of the facilities, we raise our concern and opposition to this unnecessary nuclear transport.

In Baltimore, the waste must be transferred from ship to shore. Once on land, it must be transported on the roads that are some of the busiest on the East Coast. If there is an accident while taking the waste off of the ship, how many workers might be exposed? If there is a breach of containment when over water, what is the danger of contaminating the harbor? Is there any risk to the Chesapeake Bay? What type of containers will carry the waste on the ship and on the highway? How likely will containers stay intact if there is a high impact, high speed accident? This waste is Class A Radioactive Waste, contaminated with uranium enriched to less than 5.00% U235. It is radioactive. There is no safe level of exposure to radiation and the possibility of potential exposure of many should be estimated. Though only a fraction of the exposed may suffer physical consequences, many will be in fear that they have been harmed. This has public health consequences as well.

We are concerned that these nuclear shipments could come into contact with other hazardous shipments with much greater consequences than have been considered including synergistic effects.

Why is the radioactive waste that results from the processing allowed into US radioactive disposal sites when its origin is foreign? What provisions will be made for the waste that is allegedly exported back to Germany?

NRC should be more transparent about its imports and exports and minimize the movement of radioactive wastes and materials. Some of the materials were not available on the ADAMS webpage and much more is going on in this proceeding than import and export license extensions.

Sincerely,

Dr. Gwen DuBois  
President  
Chesapeake Physicians for Social Responsibility

Diane D'Arrigo  
Radioactive Waste Project Director  
Nuclear Information and Resource Service

Damon Motz-Storey  
Clean Energy Organizer  
Oregon Physicians for Social Responsibility

- *Federal rulemaking Web site:* Go to <http://www.regulations.gov> and search for Docket ID NRC-2017-0222.
- *NRC's public Web site:* Go to <http://www.nrc.gov> and search for IW009/03 or XW015/01, Docket No. 11005149 or 11005789, Docket ID NRC-2017-0222, ADAMS Accession Nos. ML17234A650 or ML17257A128.

## Docket, Hearing

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**From:** Diane D'Arrigo <dianed@nirs.org>  
**Sent:** Thursday, January 25, 2018 8:20 PM  
**To:** Docket, Hearing  
**Cc:** Langlie, Gary; damon@oregonpsr.org; Diane D'Arrigo; bikenotbomb@gmail.com  
**Subject:** [External\_Sender] comments on 2017-0222 Areva import export uranium extension request IW009 XW015  
**Attachments:** Docket 2017-0222 Areva uranium import export comments NIRS PSR.pdf

To: the NRC hearing docket 2017-0222 for IW009/03 and Export XW015/01  
From: Diane D'Arrigo dianed@nirs.org, Gwen DuBois bikenotbomb@gmail.com; Damon Motz-Storey damon@oregonpsr.org

Attached are our comments on the Areva uranium import/export license extension.