

# PUBLIC SUBMISSION

As of: 5/23/18 12:57 PM  
Received: May 15, 2018  
Status: Pending\_Post  
Tracking No. 1k2-9363-31rt  
Comments Due: May 15, 2018  
Submission Type: Web

**Docket:** NRC-2018-0026

Very Low-Level Radioactive Waste Scoping Study

**Comment On:** NRC-2018-0026-0001

Very Low-Level Radioactive Waste Scoping Study

**Document:** NRC-2018-0026-DRAFT-0040

Comment on FR Doc # 2018-03083

## Submitter Information

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**Submitter's Representative:** Secretary Elizabeth Zimmer-Lloyd

**Organization:** Great Lakes Environmental Alliance

## General Comment

I'm writing this on behalf of Great Lakes Environmental Alliance. We're a non profit environmental educational organization, dedicted to protecting and preserving the Great Lakes Basin (& beyind) for all present & future generations. We're opposed to this, as there is NO "safe" dose/exposure to radioactive wastes!

We believe this proposed policy change is reckless & poses a real threat to our family and countless wildlife & fauna (& ALL future generations) in our environment that it will negatively impact by it.

Regarding question #1, of this scoping study: There is NO reason to create a "new category" regarding nuclear wastes. This proposition WASTE taxpayers' (& your departmental) doing this & to me, is only an attempt to make more \$, at our health's expense & unnecessarily risks detrimental harm to our Mother Earth. Regarding question #2: NO!

The NRC should use ALL resources available to continue (& increase)

it's regulatory handling of these harmful wastes, with more ACCURATE documentation of them, especially as more nuclear facilities are and will be decommissioned!

WE NEED better accounting of the nuclear wastes, these facilities have amassed & they should NOT be spread over a vast area of our country. Regarding question #3: NO! (& why not?)

Because making this somehow generic (creating a new VLLW category) will be detrimental to the very public who is supposed to be being PROTECTED (BY THE NRC)

FROM such radioactive wastes, also not allowing any knowledge (warning) to OR input from the public. Isn't it bad enough that the NRC allow this (recklessly) on a case by case basis, as in 10CFR 0.2002?

Regarding question #4: We the people (whether an agreement state or not)

should NOT be pressured by, nor have the NRC make policy that would pressure us to "follow suit" AND the NRC should clarify the legal right, for each state to be able to retain its own policy to maintain its own req

Regarding question #5: If the NRC tries to define LLRW, to remove or "exempt" radioactive control, each state still has authority over such material. If the NRC wants to impose such change to this, then they need

to justify it. Regarding question #6: There is NO justifiable reason to allow radioactive wastes being put into solid and hazardous waste facilities. The ONLY reason one would consider this, is because it's basically cheap to port

(other than \$ being saved/made by the industry, & other private industries, in an attempt to cheaply dispose of & make more \$ from these

dangerous materials, at the public and environment's health expense). Regarding question #7: Does it really matter if it's "intentional" or not? Considering, in developing a new category of VLLW it doesn't change the fact that these materials should be continuously regulated, monitored and ISOLATED from the environment, until such a time as they are

materials, to be sure that NO ENTITY in our environment is exposed to it's penetrating/ionizing negative affects, forever. This proposal means to spread these materials into areas ill equipped to isolate or ventrally socializing the losses".

Regarding question #8: My goodness, use REAL science for clues as to how to address radioactive wastes. AND/OR simply ask ANY CHILD who endured the Chernobyl or Fukushima disasters, if they think exp

needed. I mean COMON, it's common sense, that this is a BAD IDEA! Regarding question #9: The NRC is apparently incapable of adequately assessing the true economic effects this will have, considering they still haven't even admitted that exposure to nuclear fallout or nuclear wa

(despite EXTENSIVE radioactive exposure data, having been collected (for DECADES) from studies done on the people of the Marshall Islands, Vietnam, Cambodia, Laos, our own military people & right there in the U.S. in Nevada, New Mexico, etc.)

**SUNSI Review Complete**

**Template = ADM-013**

**E-RIDS=ADM-03**

**ADD= Kellee Jamerson**

**COMMENT (#40)**

**PUBICATION DATE:**

**2/14/2018**

**CITATION # 83 FR 6619**