

# PUBLIC SUBMISSION

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Diversified Scientific Services, Inc.

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Diversified Scientific Services, Inc.

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## General Comment

See attached file(s)

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## Attachments

Comment to the NRC

SUNSI Review Complete  
Template = ADM-013  
E-RIDS=ADM-03  
ADD= David Skeen, Eleanor Harrison-  
Little

COMMENT (1)  
PUBLICATION DATE: 5/15/2018  
CITATION # 83 FR 22534

Comments To the Nuclear Regulatory Commission  
Re: Docket ID NRC-2018-0080  
FR Citation:83 FR 22534

June 14, 2018

Once again, outraged US, Canadian and Great Lakes Groups are voicing strong opposition to the US Nuclear Regulatory Commission's (NRC) secret nuclear waste trafficking across our borders. Foreign nuclear waste is coming to the US to be burned and released into our air, deregulated and released to regular trash or recycling supplies to make everyday items. This trafficking hides critical information from the American people and our communities about the source, ownership, liability, quantity and timing of shipments and the true nature of these radioactive wastes.

Nuclear waste from Canadian nuclear power and weapons industries are coming (as one example) to the US by truck for processing including burning by Diversified Scientific Services, Inc. (DSSI) in Kingston, Tennessee. In a May 15<sup>th</sup>, 2018 Federal Register notice, DSSI requested NRC to approve a license amendment and renewal until March 31, 2022 to ship radioactive waste between Canada and Tennessee, most likely through Port Huron, Michigan over the Blue Water Bridge and through Buffalo, New York over the Peace Bridge.

This very short comment period ends June 14<sup>th</sup>, 2018. Many groups are voicing opposition to the license. DSSI is requesting the addition of two border exit points for the radioactive waste transports, including Port Huron, Michigan and Buffalo, New York. Radioactive wastes that have been treated by DSSI but not recycled into the consumer supply, would be shipped back to Canada. The people in the communities where the waste would be burned and processed and on transport routes between DSSI, TN and Canada, are largely unaware of nuclear waste that could impact them.

The application made public in the US Federal Register fails to mention the accompanying import license, which allows these dangerous wastes (re-classified as radioactive "materials") to be brought to the US in the first place - and now brought in secretly, under a little noticed NRC rule adopted in 2010, but first implemented in 2017 and 2018. It allows foreign radioactive wastes to be secretly imported to the US from

Canada and other countries as nuclear "materials" under a "general license," which does not require public notice or even reporting to the NRC, the regulator. The only opportunity for public comment is on the export license, which allows transport of presumably highly concentrated nuclear wastes, and is needed to make the secret import license valid.

The NRC 2010 rule renames radioactive "wastes" as "materials," so they can enter the country without public scrutiny, hiding ownership, origin and, more importantly, the characteristics of the wastes. General licenses take away normal provisions for public notification. Now, US citizens no longer have the right to comment or intervene to protect the health and safety of their communities or the environment, for any wastes being brought into the US under a general license. The identities of waste owners and producers are kept hidden and they can shift ownership and liability to transport and processing companies and cannot be sued for any accident or contamination that occurs from their dangerous radioactive wastes.

These particular wastes originate in Canada at several unidentified nuclear facilities (some of which are operated by Canadian Nuclear Laboratories, which is only disclosed publicly due to a name change in the Federal Register notice).

### **Many unanswered questions**

Where are the assays, manifests, invoices and logs at every point in this trafficking of unregulated nuclear waste? Where are the audits? How will local firefighters and first responders know what they are dealing with, in a fire or breach of containment?

Hauling large amounts of radioactive wastes to the US for any kind of "processing"--including incineration which spreads radioactivity downwind or deregulation that lets it go into landfills and consumer goods--defies logic and economic sense and puts all of us at unnecessary risk.

This scheme is meant to save Canada's nuclear industry and government laboratories the expense and obligation to protect people and the environment from these most hazardous nuclear power and weapons-related wastes. It will only help unaccountable

U.S. and global nuclear waste industries make money while spreading Canada's radioactive waste internationally.

This is part of an elaborate scheme meant to keep the American public in the dark and unaware of radioactive risks, transportation and releases in our communities. Why hasn't the NRC released the name of the Canadian nuclear waste generators and recipients of the wastes going to and from DSSI in Tennessee over our roads and bridges?

How can the public know just what - if any - nuclear wastes are shipped back to Canada? What provisions are there to ensure that additional nuclear wastes or illicit substances aren't covertly added to these transports by industry or individuals in Canada or the US? Who is monitoring these shipments and accounting to the American people?

### **What happens to the wastes in the US**

These radioactive "materials" are sent to US processors (such as DSSI) in states such as Tennessee, for incineration and segregation. Incineration does NOT destroy radioactivity--it converts it to gas or particles, some of which can be filtered (resulting in radioactive filter wastes) and some which goes out into the air for us to breathe. Wastes will likely pollute air and water and some will end up in US landfills (if "commingled" with US wastes). Some could be released unrestricted for commercial reuse and contamination of commercial recycling streams and the US public would never know. The American people have soundly defeated over a dozen attempts by US regulators to deregulate radioactive wastes. Deregulation would allow these dangerous wastes into municipal landfills and into recycling markets and thus into consumer goods, that we and our children contact regularly. Tennessee allows some radioactive wastes to be released as if they are not radioactive. Those wastes can go into some landfills and possibly into recycled materials, thus contaminating the recycled materials stream.

Concentrated radioactive waste that can't be reused or deregulated to regular trash such as ash resulting from incineration in the DSSI boiler, is apparently reclassified as "radioactive waste", to be transported back to the Canadian owners under an export

license, which is granted far ahead of any real-time knowledge of just what will be transported back.

### **Wastes present long-term hazards to life, ecosystems, DNA**

These wastes can consist of hundreds of dangerous radioactive elements, often mixed with other toxic chemicals. Many are long-lived. One example is plutonium 239, with a half-life of 24,000 years. Some are part of decay chains, which can take far longer to become safe for humans or for earth's ecosystems.

Incineration releases tritium (radioactive hydrogen) as well as other radioactive elements into the air. Decontamination allows release of some radioactive elements into a state's waterways. Tritium and other radionuclides can become organically bound in the human body, causing harm to health and can also damage DNA. Incineration produces dioxins, which are known as some of the most dangerous chemicals to health and are released into the air. Reuse and "recycling" of materials contaminated with radioactive elements introduces unseen radioactive substances into our homes and workplaces.

Nuclear workers, drivers, and inspectors at the borders are at risk from these dangerous wastes, and all communities and watersheds (including the Great Lakes) are at risk of an accident during transport, where there is a fire or breach of containment. Even without breach of containment, people in close proximity to the transports may possibly be exposed to gamma radiation, depending on characteristics of the wastes.

This shocking deregulation of irregularly radioactive waste hauling is part of a fast-growing scheme to normalize trafficking of poorly-tracked, increasingly secret shipments across much of North America and the US. Instead of being viewed as a public menace that should be transparently managed and mitigated, we have a free-wheeling especially dangerous international garbage hauling syndicate forming.

The organizations signed below are requesting additional comment time as this critically important comment period was poorly communicated to, and largely unknown by communities along the routes. We also request that the NRC initiate a Public Hearing

on this tremendously important issue that impacts health and safety of every US community. We request a Public Hearing.

**Our organizations call on NRC to deny the DSSI license request and to cease all secret (general) and specific import and export licenses for nuclear waste and materials into and out of the US.**

Citizens for Alternatives to Chemical Contamination  
Lake Station, Michigan USA  
Kay Cumbow, Education Committee

Nuclear Energy Information Service  
Chicago, IL USA  
David Kraft

Great Lakes Environmental Alliance  
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Women's International League for Peace and Freedom – Detroit Branch  
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Beyond Nuclear, Takoma Park, Maryland USA  
Kevin Kamps, Radioactive Waste Specialist

Environmentalists, Inc.  
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Environmental Justice Task Force of the WNY Peace Center  
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Nuclear Information and Resource Service  
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Jay Burney, Advocacy Committee  
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Faye More  
Port Hope Community HEALTH Concerns Committee  
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Barbara Warren, Executive Director  
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New York, USA

CCNR (Canadian Coalition for Nuclear Responsibility)  
Montreal, Quebec, Canada  
State/Province: Quebec

Don't Waste Michigan  
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Michael Keegan, Director

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Don't Waste Michigan  
Holland, MI  
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Coalition for a Nuclear Free Great Lakes  
Monroe, MI  
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