

# PUBLIC SUBMISSION

**As of:** 11/20/19 8:23 AM  
**Received:** November 19, 2019  
**Status:** Pending\_Post  
**Tracking No.** 1k3-9dee-yc8s  
**Comments Due:** November 19, 2019  
**Submission Type:** Web

**Docket:** NRC-2017-0081  
 Greater-than-Class-C and Transuranic Waste

**Comment On:** NRC-2017-0081-0027  
 Greater-than-Class-C and Transuranic Waste; Extension of Comment Period

**Document:** NRC-2017-0081-DRAFT-0045  
 Comment on FR Doc # 2019-19645

---

## Submitter Information

**Name:** Patricia Townsend

---

## General Comment

Docket No. NRC-2017-0081

I am a member of the Citizen Task Force at West Valley, representing the Buffalo-Niagara League of Women Voters. I joined the CTF less than a year ago, so I am not as knowledgeable on the issues involved as other members. I wish that I had more time to assimilate these issues and discuss them with fellow members of the CTF and with the executive committee of the League. However, the deadline for comments on Greater-Than-Class-C-and-Transuranic-Waste is upon us, so I must comment as an individual rather than for either of these organizations.

Although I attended meetings of the CTF in July and October and the Quarterly Public Meeting in August, missing no scheduled meetings, I heard nothing of this rulemaking at these meetings. At the Quarterly Public Meeting on November 13, Bryan Bower, DOE, made a brief presentation rather too late for me to gain an adequate understanding that would allow me to conduct a discussion in the groups I represent before this deadline.

Bryan Bower was not very forthcoming in response to questions. (I can understand the need for secrecy about matters of security, but I left the meeting confused about such basic questions as the difference between NRC and DOE nomenclature for these wastes, which are indeed very significant for workers, residents, and voters surrounding West Valley.) No

explanation was given for the change in agenda, which originally included a phone presentation from Mark Senderling or Doug Tonkay of DOE-HQ. There was no Powerpoint or other takeaway for study, though I was able to locate and read the NRC document on-line prior to the meeting. I understand that the NRC held a public meeting in Texas but we in Western New York had nothing from the NRC that I know of.

I know that the West Valley Demonstration Act requires that "The Secretary [of Energy] shall, in accordance with applicable licensing requirements, dispose of low level radioactive waste and transuranic waste produced by the solidification of the high level radioactive waste under the project." and that, except possibly for WIPP, there is no destination for our transuranic wastes. I am concerned that at some time in the future this NRC rulemaking will help to define our dangerously long-lived wastes out of existence or turn our site into a shallow-burial interim storage site. The lack of transparency for the Western New York public in this rulemaking does not reassure me.