From: <u>Marianne Edain</u>

To: RulemakingComments Resource

Subject: [External_Sender] NRC 2018-0300 No to Expanding Categorical Exclusions

Date: Tuesday, July 20, 2021 3:16:05 PM

Dear NRC Commissioner NRC Commissioners and Staff,

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Have you ever spent time at a highly contaminated nuclear site? I have. Its scary to be required to wear a dosimeter and then have the readings withheld. Its scary to find what look like giant garbage can lids in the desert and find that beneath them are huge valves that turn - something. What is even scarier is to discover, years later, just how contaminated your former work site was, and the fact that no one would talk about it while you were there.

My mother taught me to clean up after myself, not to start any new project until the last one was cleaned up, and to take responsibility for any mess I made. Obviously nuclear facility owners and operators have not learned that basic lesson. The messes they make will last for hundreds of thousands of years, and we the public are expected to accept responsibility for cleaning it up (which is pretty much impossible) or for living (and dying) with the consequences. This is simply not acceptable.

I oppose NRC's proposed expansion of Categorical Exclusions (published 5-7-2021). It appears NRC wants to avoid legitimate controversy and generically exclude further public input on over a dozen important and controversial impacts from the nuclear power fuel chain. I do NOT want radioactive waste at any level released from nuclear control, to get into regular trash and commercial recycling, which could make everyday household items radioactive. This proposal could do that, despite decades of public opposition to "below regulatory concern" (BRC), "very low-level waste" (VLLW), and other generic exemptions from 10 CFR 20.2002 regulations.

I do NOT want even hotter nuclear waste to go to "low-level" waste sites.

I DO WANT continued and increased surveillance of closed uranium mills.

I WANT more, not less, input on storage and transport cask designs.

I WANT more input, not less, on decommissioning plans and funding assurance requirements for reactors, uranium facilities and the proposed Consolidated "Interim" Storage facilities.

I DO NOT want NRC to improperly reclassify actions which actually cause significant environmental consequences to avoid environmental review.

I DO NOT want NRC to assume there are no impacts from the numerous exclusions listed in the advanced notice of proposed rulemaking.

This proposal violates the National Environmental Policy Act (NEPA).

NRC has not "provide(d) a reasoned explanation for the change(s)," and each of them deserves its own environmental impact statement, not an exemption.

DO NOT expand categorical exclusions. NRC should scrap this proposal and focus on reducing exclusions already allowed.

Sincerely,

Sincerely, Marianne Edain PO Box 53