

**From:** [Terry Burns](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] NRC 2018-0300 No to Expanding Categorical Exclusions  
**Date:** Tuesday, July 20, 2021 4:20:48 PM

---

Dear NRC Commissioner NRC Commissioners and Staff,

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.

The regulatory structure for handling of nuclear materials has been developed over decades. Over this time serious nuclear accidents have occurred, and thousands of Americans have been exposed to unacceptable levels of radiation. Some of these consequences are the direct result of decisions at the highest levels of government to "sacrifice" Native Americans involved in uranium mining, to risk the lives of people all over the West for the sake of "national security" and nuclear bomb development. Nuclear power plant accidents and radiation releases occur with some regularity. These events appear already to be "Categorical Exclusions", done for political reasons, ignoring health and safety. Nuclear waste still has no permanent geologic repository, and CISF ideas would double transport risks at great expense. The rule changes proposed herein do NOTHING to improve our safety, but instead only would allow further degradation of a lax, complacent and inadequate current regulatory regime.

Your job is to protect the public from some of the most toxic and dangerous materials known. SHORT CUTS ARE UNACCEPTABLE. We must keep REGULATORY in Nuclear Regulatory Commission.  
Sincerely,

Sincerely,  
Terry Burns  
13139 Vista del Mundo

San Antonio, TX 78216