

October 2, 2021

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Subject: Regarding NRC-2021-0164/Docket No. 11006421

On July 2, 2021, Perma-Fix Northwest (PFNW) in Richland, Washington filed an application with the NRC for a license authorizing the export of low-level radioactive waste to BWXT Medical, Ltd., Canada. The NRC provided notice of the opportunity to comment in Federal Register/Vol. 86, No. 176/Wednesday, September 15, 2021/Notices. (Comments due by October 15.)

The license request included a total quantity of 3.99 terabecquerels (**108 Curies**), including Tc-99. The form of the waste to be returned is thermal treatment ash (incinerator ash) and non-combustible metal. The initial waste form is identified as liquid. The total mass to be exported is not to exceed about 1.4 million kilograms of ash. This is according to the Federal Register Vol 86, No. 176, page 51387. The minimum mass (highest concentration) is not identified. The concentration of isotopes in the incoming liquid is not identified. No information is given as to whether this waste is mixed with hazardous waste per RCRA.

I am concerned that PFWW is incinerating liquid radioactive waste in close proximity to local residents and businesses. The volume of liquid to be treated in order to arrive at 1.4 million kilograms of ash seems excessive. No information is given regarding a risk analysis, accident analysis or discharges to the atmosphere.

The PFWW facility is only 10 feet above the water table, so incoming liquid waste, if spilled, could have an immediate and negative effect on the City of Richland groundwater concentrations. The PFWW EIS is very old, out of date, and based on "historical" waste from decades ago that does not include this waste.

The Washington Department of Health does not have a "listserve" or other public outreach that allows local residents to be informed of these proposed actions without an egregious effort to make regular searches of NRC records.

In addition, a well-documented recent report identifies safety failures at PFWW. See the article "Risky Business at Perma-Fix Northwest," located at <https://static1.squarespace.com/static/568adf4125981deb769d96b2/t/5fbde47518e72e5fdb9a8298/1606280319740/FINAL+PermaFix+Report.pdf>.

As a result, I would appreciate if you would review carefully the risks of the entire receipt and processing flowsheet for this waste, and not just the export license.

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