

# PUBLIC SUBMISSION

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**Docket:** NRC-2011-0012

Low-Level Radioactive Waste Disposal

**Comment On:** NRC-2011-0012-0077

Low-Level Radioactive Waste Disposal

**Document:** NRC-2011-0012-DRAFT-0106

Comment on FR Doc # 2015-06429

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## Submitter Information

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## General Comment

Sunday, July 19, 2015

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

Subject: Don't weaken radioactive waste rules -- Low-Level Radioactive Waste Disposal (Docket ID: NRC-2011-0012-0077)

Dear Secretary of the Commission Annette Vietti-Cook

I strongly oppose the proposed 10 CFR 61 changes and ask the Nuclear Regulatory Commission (NRC) to make changes in the direction of greater isolation of waste. Radioactive releases and exposure to humans and other species must be prevented, not increased.

I especially reject and ask that you remove the following provisions in your proposal:

No deregulation of radioactive waste:

Remove all provisions that would allow nuclear waste to go to regular trash or other unregulated places or into commercial recycling into consumer goods. This approach has been consistently rejected by the American public and explicitly by Congress in the 1992 Energy Policy Act. Delete the existing " 61.6 Exemptions" and the proposed addition to "61.7 Concepts" that would allow deregulating, exempting and

releasing radioactive waste and materials from radioactive regulatory control.

No increase in radiation to the public:

Reduce radiation releases: the goal should be to prevent all releases. Reject the proposed change from the current allowable public dose of 25 millirems/year to the higher 25 millirems EDE, 100 millirems EDE, 500 millirems EDE, or even more per year.

No "black box" Performance Assessments by dump operators:

Remove all provisions that would allow dump operators to do their own "Performance Assessments" and make "Safety Cases" to claim they can put more kinds of radioactive waste and longer-lasting nuclear waste in shallow land burial trenches. This presents an obvious conflict-of-interest issue, as operators would have a vested interest in a favorable outcome of such assessments.

No preemption of state's authority:

Allow states to continue setting stricter, more protective standards than NRC. Remove the "Level B" compatibility requirement.

Radioactive materials hazardous for 100 years or more should be kept out of burial grounds. Simply labeling various time periods (compliance, performance, protective assurance, etc.) and assigning increasing allowable doses does not protect anyone--it simply makes it legal to pollute.

Thank you for your attention to my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
Olema, CA