

Alaska Community Action on Toxics \* Alliance for Environmental Strategies \*  
Citizens' Environmental Coalition \* Empire State Consumer Project \*  
Learning Disabilities Association of Maine \* Nuclear Energy Information Service  
\* Sciencecorps \* Uranium Watch

July 22, 2015

SENT VIA EMAIL TO [Carol.Gallagher@nrc.gov](mailto:Carol.Gallagher@nrc.gov) & submitted at [www.regulations.gov](http://www.regulations.gov)

Nuclear Regulatory Commission Staff

Re: Docket ID NRC 2011-0012 & NRC-2015-0003: Proposed Rule regarding Low- Level  
Radioactive Waste Disposal 10 CFR Parts 20 and 61

The following organizations and individuals are requesting an Extension of the Comment Period  
to September 15, 2015 for the following reasons:

- 1) This is an incredibly complex rulemaking that references numerous documents as relevant. We have made no attempt to actually count them as they are so numerous—perhaps NRC could provide the total count of documents referenced in the Federal Register notice. The public should not be expected to search through and read an historical library to understand the current proposal.
- 2) There are significant Health and Environmental implications for future populations in the vicinity of these facilities, yet no environmental impact statement and no health assessment were prepared.
- 3) We know that currently and in the recent past, those with less political power have been targeted for waste disposal and other types of undesirable toxic and hazardous facilities. This is why environmental justice analyses are required and usually completed, but no analysis has been performed for this rule.

In the absence of the kind of analyses we believe are necessary, it falls on the public and advisors to provide the review the Agency failed to undertake in order to avoid potentially serious health consequences. We are requesting an extension to September 15, 2015. We would also appreciate the posting of all the regulatory documents that are supposed to be found in the Rulemaking docket (None have been there since the week of July 13th.)

Thank you for your attention.

SUNSI Review Complete  
Template = ADM – 013  
E-RIDS= ADM-03

Add= P. Yadav (PPY)

Respectfully Submitted,



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Citizens' Environmental Coalition  
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Uranium Watch  
Moab, Utah

## Gallagher, Carol

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**From:** Barbara <warrenba@msn.com>  
**Sent:** Wednesday, July 22, 2015 1:09 PM  
**To:** Gallagher, Carol  
**Cc:** Dembek, Stephen  
**Subject:** [External\_Sender] Docket ID NRC 2011-0012 & NRC-2015-0003; Proposed rule extension request  
**Attachments:** Final NRC Extension request on LLRW rule7.22.15.pdf

Dear Ms. Gallagher,

Attached is a request for an extension request from multiple organizations on the LLRW disposal rules.

Thank you for your attention.

Sincerely,

Barbara J. Warren  
Executive Director  
Citizens' Environmental Coalition