

## RulemakingComments Resource

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**From:** Helene Cuomo <helenecuomo@hotmail.com>  
**Sent:** Friday, July 24, 2015 7:10 PM  
**To:** RulemakingComments Resource  
**Subject:** [External\_Sender] Comment on Waste Rules: Docket ID NRC-2011-0012

Please, DEPLETED URANIUM SHOULD NOT BE CLASSIFIED AS CLASS A. IT CONTINUES TO GROW MORE RADIOACTIVE AS TIME GOES ON and this needs to be seriously considered, especially when some companies who are allowed to accept Class A waste will be then be having depleted uranium buried in not the proper way for such a potentially high level waste. It's really scary for my family and future generations.

I have some significant concerns about the proposed revisions to Part 61, but first wanted to express my support for one part: The proposed revisions appear to allow Utah to maintain its reliance upon classification tables, to enforce its long-standing ban on Class B&C wastes. Thank you for including that in the final rules. Utah must have the right to keep hotter wastes out of our state.

There are several key concerns that I'd like to highlight.

1. The new regulations reduce the compliance period. At first staff chose a 10,000 year period, but that's been reduced to only 1,000 years. This is less protective of public health and the environment. It may be hard to look so far ahead, but we owe it to future generations to model in detail to ensure safety.
2. We are concerned that licensees (such as EnergySolutions) can choose to simply order a study if they want to bring a new waste stream. This move towards the WAC approach has the potential to transfer decision-making power to consultants and overwhelm states with complex models.
3. Next, I disagree with the dramatic limitations placed on the number of intruder scenarios to be considered. This approach is not appropriate for long-lived nuclear waste streams that will require more advanced predictive modeling. Just looking at scenarios happening now is absurdly restrictive given the potential for harm for millennia.

Thank you for the opportunity to comment.

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