

RulemakingForm2CEm Resource

From: Mary Paul [marypauldesign@gmail.com]
Sent: Tuesday, June 23, 2015 10:31 PM
To: RulemakingComments Resource
Subject: [External_Sender] Comment on Waste Rules (NRC-2011-0012)

As a mother and a fifth generation Utahn, my family and I are completely at the mercy of the rules that the NRC makes to govern low level nuclear waste, as the lion's share of it is stored right here in our home state.

I have 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 from 10,000 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. An accurate assessment requires more advanced predictive modeling.
4. Finally, I request that the NRC classify Depleted Uranium. As a unique waste stream that continues to grow more radioactive for 2.1 million years, it makes no sense this has been arbitrarily lumped into the Class A category -- with waste that's only hazardous for a few hundred years. I urge the NRC to finally classify this waste accurately to inform ongoing disposal efforts.

My family and I thank you for the opportunity to comment. May we all create a legacy for future generations we can truly be proud of.

Mary Paul
6328 S 370 E
Murray, UT 84107

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