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Low-Level Radioactive Waste Disposal

Comment On: NRC-2011-0012-0077
Low-Level Radioactive Waste Disposal

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General Comment

I appreciate the opportunity to provide a comment on the proposed rule change reclassifying depleted uranium as as Class A Waste, with all of the consequences which may follow.

The successful long term disposal and storage of toxic materials is a challenge which we may not ignore. In the case of depleted uranium, the challenge is particularly troubling and complex. The long term safety of our community and environment are not the only consideration. This material will retain its toxic potential for millions of years. We cannot disregard the potential impact it may have in the far future. Generations to come who shall inherit the consequences of our actions.

As a physician and scientist, I would suggest that the long term toxicity of depleted uranium is far from being well characterised and understood. Critical unresolved issues of toxicity have been raised with regard to DU in multiple government and private studies. With that persistent uncertainty, it is extremely unwise to propose its disposal under the Class A Waste rules. To do so prematurely could lead to severe long term problems of health risks and environmental degradation which may be unmitigatable.

I urge you to set this reclassification aside for the time being while the critical issues that have been raised may be adequately addressed. We cannot afford to make a potentially colossal mistake in the disposition of this extremely long-lived waste material.