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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-0139
Comment on FR Doc # 2015-06429

Submitter Information

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General Comment

Regarding Docket ID NRC-2011-0012

Dear United States Nuclear Regulatory Commission,
I am writing regarding the proposed rule change on Low-Level Radioactive Waste.
I appreciate the opportunity to voice my concerns.

Classifying depleted uranium as Class A waste:

The classification of depleted uranium as Class A was is demonstrably false. That classification is intended for low level nuclear waste that will become benign in a relatively brief period of time. Depleted uranium becomes more radioactive over time.

Considering the chemical toxicity of uranium oxides as equivalent to its present radioactive toxicity:

The present radioactivity of the material is relatively low, of course, but the chemical toxicity of uranium oxides is anything but. Numerous studies available on the internet demonstrate that the toxicity of DU is at best unresolved. In fact, the history of the effect of this material on soldiers and civilians in theaters of war where it has been used for projectiles demonstrates that its long term effects include death and chronic illness and perhaps birth defects. It is unfortunate that the NRC has been amenable to Energy Solutions requests to lessen the protections that the proposed Clive disposal site will afford by a factor of ten, and that unfriendly agencies could fairly easily create conditions leading to the dispersal of finely pulverized DU oxides into the atmosphere. The chemical toxicity of hte material would cause widespread health effects downwind in the heavily populated Wasatch Front communities.

Failing to consider the possibility of terrorist intrusion into the Clive site:

In fact, airborne or rocket intrusion by use of explosives could cause DU to be finely pulverized and expelled into the air, as just stated. The Clive site has no means of protection from such actions.

Lining the excavation with a thin layer of clay:

Such a lining provides a minimum of protection from intrusion by animals, insects and covert personnel action.

Thank you for consideration of the foregoing points.