

RulemakingForm2CEm Resource

From: Susan Dyer [oasis@kanab.net]
Sent: Thursday, July 09, 2015 9:37 AM
To: RulemakingComments Resource
Subject: [External_Sender] Regarding Docket ID NRC-2011-0012 and Waste Rules

As a resident of Utah I am deeply concerned about the way the NRC classifies and regulates low level nuclear waste--after all, Utah has been asked to store so much of it here.

The proposed revisions seem to allow Utah to maintain its reliance on classification tables and to continue its steadfast ban on Class B&C wastes. I appreciate that Utah will be able to keep hotter wastes out of our state.

On the other hand, there are several key concerns related to Part 61 that I find to be quite problematic:

1. I'm concerned that the new regulations reduce the compliance period to only 1,000 years. Previously, staff chose a 10,000 year period, which demonstrates a stronger and more appropriate commitment to protect public health and the environment. We owe it to future generations to model in detail to ensure safety.
2. I urge you to abandon any rule that would allow licensees (such as EnergySolutions) 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. Nuclear waste is not the place to relax regulations for private corporations, ever.
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.
4. Finally, it is absurd to lump Depleted Uranium, which increases its radioactivity for 2.1 million years, into the Class A category--which is otherwise is hazardous for only a few hundred years. I request that the NRC classify Depleted Uranium as part of a unique waste stream. I urge the NRC to finally classify this waste accurately to inform ongoing disposal efforts.

Thank you for the opportunity to comment.

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