

RulemakingForm2CEm Resource

From: Christine Larson [dlars@juno.com]
Sent: Thursday, July 09, 2015 2:39 PM
To: RulemakingComments Resource
Subject: [External_Sender] Comment on Waste Rules: Docket ID NRC-2011-0012

We in Utah are very interested in the rules that the NRC makes to govern low level nuclear waste, especially since so much of that waste is stored here.

I have 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 share.

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. I am concerned that licensees (like 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. I disagree with the limitations placed on the number of intruder scenarios to be considered. This approach is not appropriate for long-lived nuclear waste that will require more advanced predictive modeling. Looking at current scenarios is absurdly restrictive given the potential for long term harm.
4. I request that the NRC classify Depleted Uranium. Since it 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 Depleted Uranium accurately.

Thank you for the opportunity to comment.

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Federal Register Notice: 80FR16081,NRC-2011-0012
Comment Number: 215

Mail Envelope Properties (1731273488.1308.1436467133128.JavaMail.tomcat)

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Sent Date: 7/9/2015 2:38:53 PM
Received Date: 7/9/2015 2:38:57 PM
From: Christine Larson

Created By: dlars@juno.com

Recipients:
"RulemakingComments Resource" <RulemakingComments.Resource@nrc.gov>
Tracking Status: None

Post Office: vweb213

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