

RulemakingForm2CEm Resource

From: Richard Andrews [rich@zeoponix.com]
Sent: Friday, July 17, 2015 3:58 PM
To: RulemakingComments Resource
Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

Do your job as the Nuclear Regulatory Commission, not the Nuclear Industry Facilitation Agency. Your mandate is to protect the public health and safety, not catering to the regulated industry. Your job is not to ease the operations of the nuclear industry. It is not to facilitate nuclear operations as one NRC official told me recently at the June 2015 NWTRB meeting in Golden, Colorado. I reminded him of his error in mission. Did you forget that the NRC was purposefully split from the AEC to remove the conflict of both being promoter and regulator. Your job is solely regulation and public health & safety, not promotion and facilitating.

Regarding the subject docket: I oppose the NRC's proposed 10 CFR 61 changes and ask NRC to make changes at ensure greater isolation of waste to prevent environmental releases and consequent higher risk of exposures. Radioactive releases and exposure to humans and other species must be prevented, not increased.

I especially reject and ask that you remove the following provisions in your proposal:

1. No deregulation of radioactive waste waste:

Remove all provisions that would allow nuclear waste to go to regular trash or other unregulated places or into commercial recycling into consumer goods. This approach has been consistently rejected by the American public and explicitly by Congress in the 1992 Energy Policy Act. Delete the existing "\$ 61.6 Exemptions" and the proposed addition to "\$61.7 Concepts" that would allow deregulating, exempting and releasing radioactive waste and materials from radioactive regulatory control.

2. No increase in radiation to the public:

Reduce radiation releases: the goal should be to prevent all releases. Reject the proposed change from the current allowable public dose of 25 millirems/year to the higher 25 millirems EDE, 100 millirems EDE, 500 millirems EDE or even more per year.

3. No "black box" Performance Assessments by dump operators:

Remove all provisions that would allow dump operators to do their own "Performance Assessments" and make "Safety Cases" to claim they can put more kinds of radioactive waste and longer-lasting nuclear waste in shallow land burial trenches. This presents an obvious conflict-of-interest issue, as operators would have a vested interest in a favorable outcome of such assessments.

4. No preemption of state's authority:

Allow states to continue setting stricter, more protective standards than NRC. Remove the "Level B" compatibility requirement.

5. Radioactive materials hazardous for 100 years or more should be kept out of burial grounds. Simply labeling various time periods (compliance, performance, protective assurance, etc) and assigning increasing allowable doses does not protect anyone--it simply makes it legal to pollute.

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