

RulemakingForm2CEm Resource

From: Natalie Houghton [tallyho4617@hotmail.com]
Sent: Friday, July 17, 2015 3:59 PM
To: RulemakingComments Resource
Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

I oppose the proposed 10 CFR 61 changes: the NRC needs to move towards greater isolation of waste. Radioactive releases and exposure to humans and other species must be prevented, NOT increased.

Of most concern, and needing to be removed from your proposal, are the following provisions:

No deregulation of radioactive 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.

Doing any of the above 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.

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.

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 is an obvious conflict of interest, as operators would have a vested interest in a favorable outcome of such assessments.

No preemption of state's authority

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

Radioactive materials which are hazardous for 100 years or more should be kept out of burial grounds. Merely labeling various time periods (compliance, performance, protective assurance, etc) or assigning increasing allowable doses protects NO ONE, but only makes it legal to pollute, and harm people's health.

Natalie Houghton
Woods Trl
Prescott, AZ 86305

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