

RulemakingForm2CEm Resource

From: Louise Amyot [lamyot@yahoo.com]
Sent: Friday, July 17, 2015 10:00 PM
To: RulemakingComments Resource
Subject: [External_Sender] Radioactive Waste Disposal 10 CFR61 Docket ID NRC-2011-0012

Dear Secretary,

One would think that Americans are so healthy and disease-free that we could afford to be lax with rules affecting our health. Instead, changes such as that proposed by the NRC to accept the less stringent EDE increase the likelihood that cancers and birth defects will continue to increase year after year. Three members of my family are cancer survivors who live or lived near Vermont Yankee and the former Yankee Rowe so it is very important to us that rules should be made more stringent, not less.

I oppose the proposed 10 CFR 61 changes and ask NRC to make changes in the direction of greater isolation of waste. 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:

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.

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 presents an obvious conflict-of-interest issue, 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 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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