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# PUBLIC SUBMISSION

**Docket:** NRC-2016-0179

Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Requirements

**Comment On:** NRC-2016-0179-0005

Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Standards; Notice of Issues Paper, Public Meeting, and Request for Comment

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## Submitter Information

**Name:** Jan Boudart

**Address:**

1132 W. Lunt Ave.  
Chicago, IL, 60626

**Email:** janunaj@hotmail.com

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## General Comment

SSR-6(305) States even more emphatically the requirement in SSR-6(304). The phrase "... all postulated events, even those of low probability ..." requires God-like prophecy of what can or might happen in any circumstances. The consignors and carriers, had they been at Chernobyl on April 26, 1986 or in Fukushima March 11, 2011, would have had to anticipate the human personality that would tell the workers to carry on with the test, or remember the steles warning against tsunamis around Fukushima. Had they been so prescient, Fukushima wouldn't have been built there, and the Chernobyl test would have been done when the reactor was built not in April of 1986.

As much as QSA-G's comment claiming the IAEA's rule too onerous evokes recognition and understanding, the obviously impossible task of protecting citizens from "... all postulated events, even those of low probability ..." is sure indication that, these shipments should not be put on the road, in the waterways or in the air.

That QSA-G singles out "terrorist explosive damage" as an unpredictable eventuality reinforces the possibility of extreme danger to which U.S. citizens would be exposed if the shipments are implemented. So, I repeat, HLRW should not be transported, or at most exactly once. Each reactor community must keep its HLRW on site in hardened storage until a reasonable solution to transport can be found.