

**From:** [Cara Melbye](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2016-0179  
**Date:** Thursday, January 19, 2017 4:07:02 AM

---

Dear Sir or Madam,

Re: Docket ID NRC-2016-0179

High-level radioactive wastes are irradiated nuclear fuel rods, and short-term exposure at close range, with no shielding, can cause immediate death. Lesser exposure can cause death or cancer for over a million years. Since there are risks of radioactive contamination from leaks or accidents or potential terrorist actions, nuclear waste must only be moved once, and only when a deep underground permanent repository is in place that could safely isolate the dangerous waste for the million years that it will remain hazardous.

I understand that the US Nuclear Regulatory Commission (NRC) has agreed with the Department of Energy's (DOE) scheme to truck highly radioactive liquid waste more than 1,000 miles from Chalk River, Ontario, Canada to Savannah River Site, South Carolina, USA, across jurisdictions and through numerous highly populated areas. Such hazardous liquid shipments are unprecedented in North American history. Faulty welding of equipment manufactured by Nuclear Assurance Corporation (NAC) at Chalk River casts serious doubt about the quality assurance and structural integrity of the jury-rigged shipping containers for the liquid shipments provided by NAC. As well, there have been waste handling failures by DOE at the Savannah River Site. NRC is not protecting public safety by approving this flawed scheme for shipping highly radioactive liquid waste.

If NRC and US Department of Transportation's (DOT) regulations are to be harmonized with International Atomic Energy Agency (IAEA) regulations and standards, such changes must better protect worker and public health and safety, and the environment. That is, if IAEA's regulations and standards are stronger, those should become NRC's/DOT's. But if NRC's/DOT's are stronger, then those should remain -- and NRC/DOT should urge IAEA to strengthen its standards. The same principle should apply internationally — if there are regulations in a certain country that are stronger/better than IAEA's and/or NRC's/DOT's, then the stronger standards should be applied to strengthen IAEA's and/or NRC's/DOT's regulations.

The point is, nuclear waste poses a dire threat to human life and health, so it is critically important that all regulations -- at NRC/DOT in the US, at IAEA internationally, etc. -- be strengthened to the highest standards and best practices, not weakened to the lowest common denominator.

C. Melbye  
Buffalo, NY/Toronto, ON