

**From:** [Ellen Thomas](#)  
**To:** [RulemakingComments Resource](#)  
**Cc:** [Ruth Thomas](#)  
**Subject:** [External\_Sender] Ruth Thomas to NRC re Docket ID: NRC-2016-0179: re packaging and transportation of radioactive material  
**Date:** Friday, January 20, 2017 8:47:19 PM

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On behalf of Environmentalists, Inc. I submit the following comments regarding The *Nuclear Regulatory Commission* (NRC) Proposed Rule: [Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Standards](#) (Docket ID: NRC-2016-0179)

Since the founding of our organization in 1972, there have been and continue to be numerous purposeful discharges of radioactive material into the environment (bomb testing, daily routine releases from both weapons and power plants, the buildup of radioactive wastes from mining, milling, processing, enrichment and fuel fabrication, and decommissioning aging nuclear facilities. In the past 45 years there have been three disastrous accidents, sending great volumes of lethal radioactive contamination into the air, water, and soil. Destruction and exposure of workers and the public has been going on through all of this.

Also there was development and testing of the bomb adding to people's exposure to man-made radiation. Weapons continue to be manufactured. The Department of Energy has been and goes on mishandling the waste products of the weapons industry. For example, there's Rocky Flats, Nuclear Fuel Services in Erwin TN, Pantex Plant in Texas, Hanford in Washington, Savannah River Plant in SC, Oak Ridge TN, and the list goes on.

There are materials with extremely long periods of being lethal, hundreds of thousands of years and on, that have made sections of our country unlivable. All of this is cumulative, most of what has gone into the atmosphere all these years is still there.

**Have those who suggested this rulemaking taken any of this into consideration? We would appreciate an explanation of how this rulemaking addresses the problem of so many people and places being harmed already.**

Transporting nuclear materials in liquid form is being suggested in this rulemaking, as well as increasing the allowable levels for certain isotopes during shipments. Casks and canisters are being designed, but the testing on them has been limited. There are independent researchers who are challenging the ability of these casks to keep the contents from leaking and withstanding highway travel. At the Monticello nuclear plant, they have had a problem with contractors who didn't follow the directions when testing the canisters for leaks.

Travel on the highways involves drivers of all sorts, some who are distracted, some who are drunk, and others who try to drive when they're sleepy. Then there are the traffic buildups, particularly at intersections and on bridges. There is no continuous oversight during these travels, and no one can predict where an accident will happen. So the threat of people having to be evacuated is real. There is also a lack of coordination among the various agencies, with none of them near where the accident will happen.

This rulemaking, The *Nuclear Regulatory Commission* (NRC) Proposed Rule: [Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Standards](#), must be withdrawn.

Please keep us informed at the following address.

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