

<b>As of:</b> 1/23/17 9:45 AM <b>Received:</b> January 20, 2017 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1k1-8ua3-unnu <b>Comments Due:</b> January 20, 2017 <b>Submission Type:</b> Web
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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

**Document:** NRC-2016-0179-DRAFT-0049

Comment on FR Doc # 2016-27944

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## General Comment

9. Regulations regarding the exterior surface contamination of irradiated nuclear fuel shipments are too lax in both the U.S., and internationally. The shocking history from Areva in France is a cautionary tale. Thanks to the work of watchdogs and investigative journalists, it was revealed that from one-quarter to one-third (adding up to hundreds of shipments) of all irradiated nuclear fuel shipment traveling to the La Hague reprocessing facility had external radioactive contamination measuring, on average some 500-times the regulatory limit. In one case, the contamination measured 3,000-times the regulatory limit. (See the Transport Special - Plutonium Investigation n6/7, posted online at WISE-Paris under the Bulletins tab: <<http://www.wise-paris.org/>>)

But the U.S. has had a bad history along similar lines. The State of Nevada Agency for Nuclear projects has documented "49 incidents of accident surface contamination," in a report entitled Reported Incidents Involving Spent Nuclear Fuel Shipments, 1949 to [1996] (posted online at <<http://www.state.nv.us/nucwaste/trans/nucinc01.htm>>).

Such external contamination could result in significant exposure to hazardous ionizing radioactivity, to nuclear waste transport workers (truck drivers, locomotive engineers, barge crew, inspectors, etc.), other

workers (toll booth attendants, gas station attendants, rest area attendants, port authorities, dock workers, customs officials, etc.), and unwitting, innocent, passerby members of the public, as well as residents along transport routes.

Clearly, both U.S. and international regulations safeguarding against such external shipping container contamination must be strengthened significantly, to avoid any repeats of the French fiasco, and the American mistakes.