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**To:** [RulemakingComments Resource](#)  
**Cc:** [Maupin, Cardelia](#); [McCartin, Timothy](#)  
**Subject:** [External\_Sender] NRC Docket ID: NRC-2017-0081  
**Date:** Thursday, September 12, 2019 3:12:10 PM

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Dear NRC Commissioners,

Please halt the proposal to reclassify waste would create risks to our health, safety, the environment and the Texas economy. Reclassifying is a disastrous plan that would allow very hot Greater-Than-Class C and TRU waste to go into shallow burial pits instead of deep underground in a geologic repository, the less risky approach currently required for safety reasons.

This proposal would set in motion the plan to send the nation's entire inventory of this waste stream to Texas. The amount of waste analyzed in the Generic Environmental Impact Statement was 420,000 pounds and 161 million curies. This massive amount of curies is more than 28 times the full licensed capacity of WCS' huge federal waste pit and 41 times the full capacity of the adjacent Compact Waste pit.

This would be a huge increase in very hot material including irradiated metal from inside nuclear reactor cores. Shallow burial at the WCS site would be close to the nation's largest freshwater aquifer, the Ogallala, at a site prone to temperature extremes, earthquakes, floods, wildfires and tornadoes.

Some of the radioactive materials, especially Technetium-99, can volatilize. Winds could spread radioactive contaminants into the air, soil and water, leading to disaster. If containers leak due to cracks or fissures various water bodies could be impacted, as TCEQ Radioactive Materials Division staff warned against when they recommended denial of the license for WCS' low-level waste site. The bottom of the shallow burial for GTCC waste would be only 120' deep, not 2000 feet or more, as it should be. According to WCS' Environmental Assessment, 100,000 pound containers would be stacked up to seven units deep, putting them close to the surface, where radioactive materials could volatilize even more readily. Human inhalation would become a risk.

Shallow burial of highly radioactive materials in a region prone to earthquakes fails to meet the common sense test. One earthquake had its epicenter just 5 miles away from the site in Eunice, New Mexico. The Permian Basin is the nation's largest oil producing region. What would happen if such a major oil supply became contaminated?

Transport of this massive poisonous waste stream through our communities for the unjustified purpose of shallow burial should be prevented. At least 33,700 truck shipments or 11,800 rail shipments of highly radioactive waste would occur, but the public can't comment effectively since routes have not been set.

Please halt the changes that would reclassify GTCC and TRU radioactive waste immediately and ensure that it will only go into a deep geologic repository as federal law now requires. This law was designed to protect living things by isolating these dangerous materials deep underground. It is essential that current law remains in place in order to protect our health and safety, all living things and our economy.

Furthermore, please extend the comment period 90 days to allow for full analysis of the complicated technical and practical implications of the potential rule change and so that more people will have the opportunity to comment effectively.

Sincerely,

Sonia Santana

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