

From: [Michel Lee Council](#)
To: [RulemakingComments Resource](#)
Subject: [External_Sender] Comments CIECP & PHASE re Docket ID NRC-2017-0081 - Manage Greater-Than-Class-C Nuclear Waste as High-Level Waste
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Joint Comments of the Council on Intelligent Energy & Conservation Policy (CIECP) and Promoting Health and Sustainable Energy (PHASE)

RE: Docket ID NRC-2017-0081 – Manage Greater-Than-Class-C Nuclear Waste as High-Level Waste – Draft Regulatory basis “Regulatory Basis for the Disposal of Greater-than-Class C (GTTCC) Waste,” (ML19059A403)

Via email: U.S. Nuclear Regulatory Commission Rulemaking.Comments@nrc.gov

Dear NRC:

We are at a loss to comprehend the thinking that has gone into consideration of spreading this dangerous extraordinarily radioactive and toxic material further throughout the United States and with relaxed regulatory control.

Implementation of this reckless proposed schema on the part of the Nuclear Regulatory Commission (NRC) would put into motion a slow-moving environmental and public health catastrophe of incalculable proportion, with impacts cascading far into the future.

Frankly, what springs to mind, are the revelations made by Alla Yaroshinskaya, a member of the Congress of People’s Deputies to the USSR who became head of the parliamentary commission set up in 1991 to look into the consequences of Chernobyl. In a book published nearly 25 years ago, Yaroshinskaya detailed the commission’s discovery of 40 secret “protocols” of the Kremlin. These were protocols issued on different days beginning on April 29, 1986 and continuing through June 1986 which laid out minutes of meetings of the Politburo’s disaster operational group.

Secret Appendix to Point 10 of Secret Protocol No. 32, of Aug 22, 1986, states “In order to avoid the accumulation of large amounts of radioactive matter in people’s bodies as a result of eating contaminated food, the Minister of Health of the USSR recommends *distributing the contaminated meat as widely as possible in the country* and using it to make sausages, preserved meat, and meat products in a proportion of one to ten with normal meat.” (Yaroshinskaya, Alla, “Chernobyl: The Forbidden Truth,” University of Nebraska Press, 1995, at p 128, emphasis in original.)

So now it appears the NRC may be adopting a similar line of thinking: Spread the poison.

However the NRC cannot hide behind the excuse of ignorance or exigency.

Our organizations emphatically oppose allowance of GTCC to be placed in “low-level” nuclear radioactive waste sites or any other reduction of the already inadequate protection of the public.

GTCC must continue to be treated as the high-level nuclear waste hazard it is and will remain for countless generations to come.

Sincerely,

Council on Intelligent Energy & Conservation Policy (CIECP)
Promoting Health and Sustainable Energy (PHASE)

November 19, 2019