

From: [Raymond Vaughan](#)
To: [RulemakingComments Resource](#)
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Subject: [External_Sender] Comments, GTCC, Docket ID NRC-2017-0081
Date: Tuesday, November 19, 2019 10:29:27 PM
Attachments: [Vaughan NRC-2017-0081 comment letter 11-19-19.pdf](#)

Please see my comment letter attached.

Raymond C. Vaughan

534 Delaware Ave., Suite 302
Buffalo, NY 14202
November 19, 2019

Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Rulemaking.Comments@nrc.gov

Re: Comments on U.S. Nuclear Regulatory Commission's Draft Regulatory Basis for Greater-than-Class-C and Transuranic Waste, Docket ID NRC-2017-0081

Dear Rulemakings and Adjudications Staff:

Please see my two comments below:

1. The West Valley Demonstration Project Act of 1980 (PL 96-368) has not been superseded by the Low-Level Radioactive Waste Policy Amendments Act of 1985 and continues to exclude transuranic waste from its definition of low-level radioactive waste.
2. A radiation dose of 5 mSv/yr (500 mrem/yr) limit is far less protective than a 1-in-one-million risk standard and should therefore not be proposed or used as a radiation protection threshold for this draft regulatory basis or other regulatory or policy development.

Thank you for this opportunity to provide comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rayd Vaughan", with a long horizontal flourish extending to the right.

Raymond C. Vaughan, Ph.D., P.G.
Professional Geologist/Environmental Scientist

cc: Bryan Bower, U.S. Dept. of Energy
Paul Bembia, NYSERDA
West Valley Citizen Task Force