48

PR-061
84FR35037

PUBLIC SUBMISSION

As of: 11/20/19 9:03 AM
Received: November 19, 2019
Status: Pending_Post
Tracking No. 1k3-9der-9shj
Comments Due: November 19, 2019
Submission Type: Web

Docket: NRC-2017-0081
Greater-than-Class-C and Transuranic Waste

Comment On: NRC-2017-0081-0027
Greater-than-Class-C and Transuranic Waste; Extension of Comment Period

Document: NRC-2017-0081-DRAFT-0054
Comment on FR Doc # 2019-19645

Submitter Information

Name: Diane D'Arrigo NIRS

General Comment

Secretary, Nuclear Regulatory Commission (NRC)
ATTN: Rulemaking and Adjudications Staff
Washington, DC 20555-0001

Re: Docket ID NRC-2017-0081, GTCC Greater than Class C nuclear waste

Dear NRC Commissioners and Staff:

Nuclear Information and Resource Service (NIRS) has been tracking the GTCC issue for decades and continues to call for treating this waste as high level. We also support the comments of Dr Resnikoff Radioactive Waste Management Associates, Karen Hadden SEED Coalition and the multigroup comments submitted by Barbara Warren Citizens' Environmental Coalition. We support the concept of requiring more control and greater isolation of classes A, B and C "low-level" waste than currently required. GTCC is even more concentrated and capable of large doses for centuries to come. We oppose allowing this waste in 10 CFR 61 facilities.

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called low-level waste sites.

Greater than Class C or GTCC waste is the most concentrated so-called low-level radioactive waste, not suited to shallow land burial. It can have more deadly and long-lasting radionuclides than some of the hottest high level waste. In fact some reactor core components are radioactively hotter than the hottest irradiated fuelHigh Burnup Fuel.

The NRC draft regulatory basis, Regulatory Basis for the Disposal of Greater-than-Class C (GTCC) Waste, (NRC ADAMS Accession No. ML19059A403) is not adequate to justify this very dangerous generic deregulation and reduction in regulatory control of nuclear power waste.

According to nuclear physicist Dr. Marvin Resnikoff,

from 10 years on, the core shroud (GTCC) is more radioactive than High Burnup Fuel (high level waste). The long-lived Nickel-59 (half-life 75,000 years; hazardous life 750,000 to 1,500,000 years) accounts for the long-lived radioactivity in both the core shroud and high burnup fuel. The core shroud also contains the long-lived Nb-94 (half-life 20,000 years; hazardous life 200,000 to 400,000 years), which is a gamma emitter. Reactor internals closest to or part of the reactor core, such as the core shroud, are the most radioactive internal components

Dont weaken controls and protections over nuclear waste, especially as reactors close and are decommissioned and more GTCC waste is generated.

Don't change the rules to allow a huge increase the amount of radioactivity going to the Waste Control Specialists TX site by 160 million curies, more than 28 times the licensed amount. Require better storage.

Instead of pretending it can go into shallow burial grounds, continue to manage GTCC radioactive waste as High Level to give the world a better chance of isolating it from our air, water, environment and gene pools for the millennia it remains radioactively hazardous .

Sincerely,

Diane D'Arrigo
NIRS