

**From:** [Patricia Reynolds](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 10:03:17 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. HAVE WE LEARNED NOTHING FROM BURYING RADIOACTIVE WASTE IN GREENLAND WHERE THE ICE IS MELTING AND IT'S COMING TO THE SURFACE? HAVE WE LEARNED NOTHING FROM BURYING RADIOACTIVE WASTE IN THE MARSHALL ISLANDS WHERE THE SEAS ARE RISING AND THE 'DOME' IS FAILING?? WALK UP NOW AND STOP THIS INSANITY.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Patricia Reynolds  
1180 Woods Circle  
Atlanta, GA 30324

**From:** [Nancy Currah](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 7:41:19 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

As if we have to ask! Do you think it's fine to pour poison in our water and leave long lasting DEADLY nuclear waste in ditches around the country? To even entertain this lazy irresponsible deregulation would be a crime against this country and it's people. This is no game! THIS IS DEADLY SERIOUS.

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 fuel—High 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..."

Don't 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,

Sincerely,  
Mrs. Nancy Currah  
1511 South Cedar Street  
Casper WY, WY 82601

**From:** [Jan Boudart](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 7:05:09 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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

We all have to face the intractable problem that nuclear waste presents. What are we going to do with our nuclear waste for the next 100,000 years?

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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Jan Boudart  
1132 W Lunt Ave Apt 7D  
Chicago, IL 60626

**From:** [Kae Bender](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 6:46:29 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Holy crap! As WWII nuclear waste surfaces in the Pacific, this is hardly the time to skimp on disposal of nuclear waste in the US. There is NO excuse to bury nuclear waste and forget it -- the toxic mess is bound to come back to haunt us.

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 fuel—High 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..."

Don't 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,

Sincerely,  
Ms. Kae Bender  
42955 Cherbourg Lane  
Lancaster, CA 93536



**From:** [Martha E. Martin](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 6:42:54 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

I oppose allowing 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, and is 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 fuel—High 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...”

Don't 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,

Sincerely,

Ms. Martha E. Martin  
P.O.Box 790300  
PO Box 790300, Paia, HI 96779  
Paia, HI 96779

< } -->

**From:** [Concerned Citizens for Nuclear Safety](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 6:41:08 PM

---

November 19, 2019

**Re: NRC Rulemaking Comments for Docket ID NRC-2017-0081--Manage Greater-Than-Class-C Nuclear Waste as High-Level Waste**

< }

**From:** [susan michetti](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 6:18:07 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

All radiation needs to be treated as extremely harmful to human health both as carcinogens and as mutagens harmful to future reproduction of the human race. this is why mankind must not be careless. It is time to be cautious not reckless.

Sincerely,

Sincerely,  
Ms. susan michetti  
605 shiela st  
mt horeb, WI 53572

**From:** [Ruth Hosek](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 6:17:37 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

Best solution. No more radioactive increase from anything.

Sincerely,

Sincerely,  
Ms. Ruth Hosek  
175 E. Delaware Place  
Chicago, IL 60611

**From:** [DOUG BOGEN](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 5:59:44 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Please do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. There is no justification for allowing these wastes to be disposed of in this manner.

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 fuel—High 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...”

Don't 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,



Sincerely,  
Mr. DOUG BOGEN  
21 Lois Ln  
Barrington, NH 03825

**From:** [Carol Hedlin](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 4:50:47 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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

Really! This is terrible, please do not continue this practice.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Carol Hedlin  
PO Box 1089  
LaConner, WA 98257

**From:** [Barbara Frackiewicz](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 4:22:19 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Why would you allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites, even in unlined trenches?

Please do NOT allow this, now or in the future.

Sincerely,  
Barbara Frackiewicz

Sincerely,  
Barbara Frackiewicz  
900 Delaware Ave 502  
Buffalo, NY 14209

**From:** [Bo Svensson](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 3:37:33 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

Leave a legacy that all the future generations of your family can really be proud of you for !!

Sincerely,

Sincerely,  
Mr. Bo Svensson  
63 Westgate Circle  
Santa Rosa, CA 95401

**From:** [Marcel Buob](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 2:54:57 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

As a European citizen and resident and the governments here sometimes copy bad and dangerous policy from the US, I urge you NOT to 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 fuel—High 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...”

Don't 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,  
Marcel Buob

Sincerely,  
Marcel Buob  
Schepenenstraat 4  
Schepenenstraat 4  
Wijgmaal, ot 3018



**From:** [Sally Jane Gellert](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 2:53:54 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. The very definition of a low-level site means that extreme radiation is NOT expected, planned for, or appropriate. It is dangerous to treat all radioactive waste similarly, and I would expect that the NRC would realize that and ensure that rules do not change to increase danger. You are a REGULATORY, not a RUBBER-STAMP agency, and you would do well to remember that and DO YOUR JOB! As we do not actually have a place to store this stuff—particularly over centuries and millennia—it is time to stop making more, as well!

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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Sally Jane Gellert  
210 Broadway  
Woodcliff Lake, NJ 07677

**From:** [Dennis Nelson](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 2:48:06 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

Ionizing radiation in the form of extremely high energy photons and particles is so dangerous in the environment because it can't be diluted below a dangerous concentration. Even a single photon or particle can have enough energy to destroy or mutate a cell or sub-cellular organelle by micro-ballistics or penetrating injury. This is not the same as chemical toxicity and must not be treated the same in risk calculations as has been done in the past. Ionizing

radiation is too dangerous to human health to be used as a solution to our national energy needs.

Sincerely,

Dennis Nelson, Director SERV  
Support and Education for Radiation Victims

Sincerely,  
Ph.D. Dennis Nelson  
10952 Decatur Road  
10952 Decatur Road, San Diego  
San Diego, CA 92126

**From:** [Dr. F Taylor](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 2:24:23 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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.

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,  
coord. Dr. F Taylor  
412 Marsh Pt.  
412 Marsh Pt.  
Hilton Head, SC 29926

**From:** [Betty Ramsey](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 2:17:11 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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

My brother-in-law has retired from the EPA. He used to clean up Super Sites. He was also the team leader for the Cassini Mission to Saturn. He has explained to me the problems with nuclear waste and what you are proposing is a hazard beyond belief.

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 fuel—High 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...”

Don't 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 in 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,

Sincerely,  
Ms Betty Ramsey  
8426 Drop Camp St  
Las Vegas, NV 89123

**From:** [Annamaria Lavery](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 1:56:40 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

It is frightening that you are considering allowing super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. Please take proper and serious action to safeguard the Ogallala Aquifer, which provides water to many locations all over the USA, and to protect all of our lands, waters and air.

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 fuel—High 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...”

Don't 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 .

Thank you for your attention and consideration.

Sincerely,



Annamaria Lavery

Sincerely,  
Ms. Annamaria Lavery  
2415 Glenwood Dr  
2415 Glenwood Dr, Boulder, CO  
Boulder, CO 80304

**From:** [Jana Perinchief](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 1:48:21 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

In order to protect our citizens and their environment, please 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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Jana Perinchief  
3330 Arbor Way  
Sacramento, CA 95821

**From:** [MaryAnn and Frank Anngraffagnino](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:57:24 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

AS A PHYSICIAN AND AS TWO CARING AND CONCERNED PEOPLE, FOR THE HEALTH AND WELL-BEING OF ALL CURRENT AND FUTURE GENERATIONS, WILDLIFE AND THE ENVIRONMENT, Keep super-hot nuclear power waste out of soil ditches! THIS IS THE HEALTHY, RIGHT, FAIR, JUST, HUMANE ACTION TO TAKE!!!!!!

Sincerely,

Sincerely,  
Dr. MaryAnn and Frank Anngraffagnino  
1467 Marvin Gardens Ln  
Prescott, AZ 86301

**From:** [Jean Hodgins](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:22:59 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Please, anything you put into the soil leaches into the soil, down to ground water, into tributaries, etc. etc. What are you thinking???

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 fuel—High 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...”

Don't 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,

Sincerely,  
Mrs. Jean Hodgins  
620 Cindy Ln  
Ballston Spa, NY 12020

**From:** [fritz bachman](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:22:07 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

This stuff is poisonous to all living beings!

Sincerely,



Sincerely,  
Mr. fritz bachman  
2003 starbuck  
MOAB, UT 84532

**From:** [Paul Palla](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:11:51 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

STOP CREATING THIS WASTE IN THE FIRST PLACE SINCE THERE'S NO SAFE WAY TO STORE IT!!

Sincerely,

Sincerely,  
Mr Paul Palla  
30 Cottage St  
Waynesboro, PA 17268

**From:** [Anne Jackson](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 11:59:53 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

THIS IS ABSURD THAT WE EVEN HAVE TO SAY THIS TO YOU !!! ... THIS IS SO OBVIOUS A THING NOT TO DO, I CAN'T STAND IT ... WHAT ARE YOU TRYING TO DO, INTENTIONALLY KILL US ?? :

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 fuel—High 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..."

Don't 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,

Sincerely,  
MRS Anne Jackson  
PO Box 516  
Morgantown, PA 19543

**From:** [Bella Silverstein](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 11:34:26 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

The half-life of uranium 238 is of 4.5 billion years, while uranium 235 has a half-life of 'only' 700 million years. Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called "low-level" waste sites. That radioactive waste is now exactly as dangerous as it was when it was created.

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 fuel—High 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..."

Don't 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. If you care anything about human life, this will give the world a better chance. Keeping it High Level gives us a better chance at isolating it from our air, water, environment and gene pools for the millennia it remains radioactively hazardous .

Sincerely yours,

Bella Silverstein

Sincerely,  
Mr. Bella Silverstein  
15620 Carrousel Dr.  
Santa Clarita, CA 91387

**From:** [Betsy Toll](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 11:05:05 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

I am writing to strongly urge you NOT to allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites.

Greater-than-Class-C, or GTCC, nuclear waste is the most concentrated misnamed “low-level” radioactive waste, and totally inappropriate for 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 fuel—High 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, this contaminated waste is among the longest-lasting deadly pollutants ever devised. It’s properties will affect soil and ground water for eons. Where it dries, highly contaminated dust will spread by winds.

The highest controls and protections over nuclear waste should be maintained and enforced rigorously, now, not weakened to create a contamination nightmare in the future, 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.

We cannot discard our generation’s radioactive waste into shallow burial grounds. It is imperative that GTCC radioactive waste co tiniest to be managed as High Level waste. Strong regulation , enforcement and oversight are the only way to give the world a better chance of isolating the waste and its radioactive contaminants from our air, water, environment and gene pools for the millennia that it will remain. The pressures of momentary expediency cannot be allowed to narrow your thinking to a short term frame.

You are obligated to ensure that our most horrific, radioactively hazardous, legacy to future generations is managed with the highest levels of seriousness and responsibility in your deliberations and decisions.

Sincerely,



Sincerely,  
Ms. Betsy Toll  
PO Box 86834  
3841 SE 51 Ave.  
Portland, OR 97286

**From:** [Stan Robinson](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 10:59:46 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Sometimes I dream of a government that properly represents the needs of its people. Obviously, that's not what we have now. But isn't there somebody there, anybody, who recognizes those needs, and can help to meet those needs? If so, please direct this message to him or her!

DON'T allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called "low-level" waste sites.

DON'T 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, NOT more lethal 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,

Sincerely,  
Stan Robinson  
9 Wheelock Road  
Wayland, MA 01778

**From:** [Erline Towner](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 10:33:50 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Wake up.

Treat super-hot and long-lasting radioactive waste (GTCC) With proper disposal for this dangerous material.  
Prevent it from intentionally going 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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Erline Towner  
49 Quarry Circle  
Milford, NH 03055

**From:** [ML Polak](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 10:29:51 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Please Do NOT allow super-hot, extremely dangerous, 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 fuel—High 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...”

Don't 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,

Sincerely,  
Miss. ML Polak  
329 S Hicks St  
Philadelphia, PA 19102

**From:** [Patrick Bosold](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 10:29:14 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

I urge you to NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. If this practice is approved and proceeds, it will be a public health and environmental disaster.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Mr. Patrick Bosold  
202 N 5th St  
Fairfield, IA 52556



**From:** [Hillary Wagner](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 10:24:13 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to murder innocent people by being hidden in 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 fuel—High 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...”

Don't 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,

Sincerely,  
Mrs. Hillary Wagner  
320 E Whipp Rd  
Dayton, OH 45459, OH 45459

**From:** [Jessica Fielden](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 10:06:48 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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

This is a public health issue.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Dr. Jessica Fielden  
6620 Woodland Pl  
Oakland, CA 94611

**From:** [david bezansib](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 9:58:45 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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.

Leaving fissile waste unsealed atop soil allows it to be taken into the food chain - from plants, to small animals, and to humans - via bioaccumulation. Any amount of ionizing radiation exposure is harmful.

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,

Sincerely,  
Dr. david bezansib  
2212 shelter creek lane  
san bruno, CA 94066

**From:** [Peter Childs](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 9:58:21 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

PLEASE!!! STOP AND THINK! WHAT ARE WE LEAVING FOR OUR DESCENDANTS? IS MONEY THE ONLY THING THAT MATTERS? IS MAMMON OUR MASTER?

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 fuel—High 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...”

Don't 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,

Sincerely,  
Mr. Peter Childs  
3572 Thomas Rd.  
3572 Thomas Rd.  
Miranda, CA 95553



**From:** [Marian Ronan](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 9:24:16 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

I am a seminary professor and grandmother of four. The health and survival of humanity, that is, us, is of the utmost importance to me. So:

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 fuel—High 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...”

Don't 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 .

Please, please, please!

Sincerely,

Sincerely,  
Dr. Marian Ronan  
385 Argyle Rd. 1-D  
Brooklyn, NY 11218

**From:** [steve hopkins](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 9:05:37 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

It is absolutely insane to permit the dumping of high level radioactive waste in unlined shallow ditches; especially in areas adjacent to major aquifers. Contamination of a major aquifer would, eventually force abandonment of that portion of the country directly affected.

Disposal of highly radioactive waste is a major problem which is going to require the political will, time and adequate resources to resolve. Quick and dirty solutions will surely fail over time, resulting in certain disaster at some point in the future.

Sincerely,     Steve Hopkins

Sincerely,  
Mr. Steve Hopkins  
6 Peck Ave #62b  
Rye, NY 10580

**From:** [Linda Listing](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 9:01:42 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. I live in Canonsburg PA where we are still suffering the effects of radioactive waste. Please do not do this!

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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Linda Listing  
226 spruce st  
Canonsburg, PA 15317

**From:** [Janet Tice](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 8:55:01 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

I can't believe I'm even having to write this letter, that  
you would even consider doing such a thing.

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 fuel—High 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...”

Don't 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,

Sincerely,  
ms Janet Tice  
310 Umstead  
310 Umstead  
Chapel Hill, NC 27516



**From:** [Terry Jess](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 8:53:36 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 . This “stuff” doesn't go away. What are you thinking!

Sincerely,

Sincerely,

Mr. Terry Jess  
955 5th Avenue SW  
Albany, OR 97321

**From:** [Laura Horowitz](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 8:50:11 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

It is your responsibility to act in the public interest.

Sincerely,

Sincerely,  
Ms. Laura Horowitz  
6544 Darlington Rd  
Pittsburgh, PA 15217

**From:** [Liz Entwisle](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 8:45:29 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. As an energy and environmental lawyer, I have closely studied spent nuclear waste disposal and know we have to be wiser than to release this high level waste into the environment without the proper protections needed over long geologic time.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Liz Entwisle  
14417 Old York Road  
Phoenix, MD 21131

**From:** [Jim Perkins](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 8:44:25 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

I worked for many years on nuclear issues, but I always tried to maintain an even hand. When friends and colleagues said things like: "Oh, they'll just change the name and dump it," I'd be skeptical.

I'm not so sure those friends weren't right.

With a president who will do or say anything, it may be possible to ignore the level of radioactivity in the waste stream, but that doesn't mean it is prudent or a good practice.

We will someday have a facility for spent fuel and other highly radioactive wastes. For want of a better plan, let's just hold onto the GTCC waste and dispose of it at that time. If leaders in the regulatory field come along later and say, "oops, that was a misguided decision, made in an anti-regulatory whim," we should be able to back up and undo the error.

Jim Perkins  
191 Besse Road  
Wayne, Maine 04284

Sincerely,  
Jim Perkins  
191 Besse Rd  
Wayne, ME 04284

**From:** [Barbara Antonoplos](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 8:31:50 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

The people of the U.S. depend on you to protect us and our environment. PLEASE! Do this for us!!

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 fuel—High 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...”

Don't 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,



Sincerely,  
Ms. Barbara Antonoplos  
369 Bass St., SE  
Atlanta, GA 30315

**From:** [Rebecca Ramsay](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 8:23:51 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

High-level, long-lasting radioactive waste (GTCC) should not be deposited in low-level waste sites, especially any located near the Ogallala Aquifer, a drinking water and irrigation source for eight of our states.

Sincerely,

Rebecca L. Ramsay

Sincerely,  
Ms. Rebecca Ramsay  
30 Churchill Avenue Apt. 610  
Cambridge, MA 02140

**From:** [Ann Behrmann](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 3:08:48 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

As a pediatrician well versed in the health effects of radiation and the length of it's half life, this would be a population disaster--just look at effects from Hanford, Rocky Flats , Fernald and elsewhere where unintentional radioactive pollution has increased the risk of cancer--both bone marrow, thyroid and solid tissue.

Please 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 fuel—High 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..."

Don't 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 .

We look to the NRC to do the correct thing to protect the health of our nation in decades and centuries to come.

Sincerely,  
Ann T Behrmann MD

Sincerely,  
Dr. Ann Behrmann  
2209 Chamberlain Ave.  
Madison, WI 53726

**From:** [John Kersting](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 3:07:21 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

My family, many friends and I have watched with horror as our bodies and those of our children take ever greater numbers and loads of toxic substances, it is time to stop.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Mr. John Kersting  
2404 Olympia Ave NE  
2404 Olympia Ave NE  
Olympia, WA 98506

**From:** [Christopher Logan](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 2:32:32 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

WHAT? IS THIS FOR REAL? YOU MUST BE CRAZY TO EVEN CONSIDER IT.

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 fuel—High 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...”

Don't 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,  
Christopher Logan

Sincerely,  
Mr. Christopher Logan  
1229 Dalton Dr.  
Eugene, OR 97404



**From:** [MARY ROJESKI](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 2:27:55 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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: What would you want for your family? to be near this?

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 fuel—High 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...”

Don't 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,

Sincerely,

Mrs. MARY ROJESKI  
2603 3RD ST APT 6  
Santa Monica Los Angeles Count, CA 90405

**From:** [Lonnie Clark](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 2:13:40 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

At what point will you remember you have a soul and your grandchildren will be affected by this? Dont be a bean counter, order follower...find your Courage and support our requests for sanity and safety.

Sincerely,

Sincerely,  
Lonnie Clark  
PO Box 1495  
Eugene, OR 97440

**From:** [jon longworth](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 1:53:10 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

I AM JON LONGSWORTH AND I APPROVE THIS MESSAGE.

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:

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 fuel—High 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...”

Don't 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,

Sincerely,  
mr jon longworth  
jon@longworth.com  
Aptos, CA 95001

**From:** [Stephen Bailey](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 1:49:20 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

DO YOUR JOBS AND PROTECT US FROM THIS POISON WHICH IS L I T E R A L L Y THE HELLFIRES OF DAMN-NATION!!! A MILLION YEARS POISON!! FOREVER POISON!!

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 fuel—High 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...”

Don't 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,

Sincerely,  
Mr. Stephen Bailey  
4778 Edward Dr  
Deming, WA 98244



**From:** [Judith Eda](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 1:35:15 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. Please remember: YOUR JOB IS TO PROTECT THE AMERICAN PEOPLE.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Judith Eda  
4655 NE Killingsworth #33  
Portland, OR 97218

**From:** [Joel Porter](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 1:31:10 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

I USED TO WORK RAD-WASTE AT PILGRIM POWER ON CAPE COD. WE PUT A LOT OF CONTAMINATED CRAP IN STEEL BARRELS TO BE BURIED IN KENTUCKY. S T E E L -R U S T S-, -T H E N- -L E A K S-.

Sincerely,

Sincerely,  
Mr. Joel Porter  
1215 NE 63rd Ave  
PORTLAND, OR 97213

**From:** [Doug & Mary Wylie](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:36:27 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

One would hope that all nuclear waste would be treated with an abundance of caution. Reducing that caution would seem to represent short-term gain with major, potentially fatal long-term results. Therefore, I request that you 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 fuel—High 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...”

Don't 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,

Sincerely,  
Mrs. Doug & Mary Wylie  
9692 W 71st Ave  
Arvada, CO 80004

**From:** [John and Polly Wood](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:34:36 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Are you insane? You are prepared to support a clown setting policy? 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 fuel—High 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..."

According to Republican clowns, "Duh.... Wha?"

Don't 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,

Sincerely,  
Mr & Mrs John and Polly Wood  
POB  
Street 2  
Hood River, OR 97031



**From:** [Eugene Craig](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:26:19 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

My family and I DO NOT want you to 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 fuel—High 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...”

DO NOT weaken controls and protections over nuclear waste, especially as reactors close and are decommissioned and more GTCC waste is generated.

DO NOT 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, you must 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,

Sincerely,  
Mr. Eugene Craig  
3338 Kimber Ct Apt 7  
San Jose, CA 95124

**From:** [Ellen Koivisto](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:24:53 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Are you insane? Really? 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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms. Ellen Koivisto  
1556 Great Hwy  
San Francisco, CA 94122

**From:** [B. Bailey](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:23:53 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. This hot waste goes into our watersheds, affecting drinking water for humans and all other life. Please do not poison us - continue managing GTCC with high-level radioactive waste.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Ms B. Bailey  
po box 556  
Eastsound, WA 98245

**From:** [Ann Clarkson](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:13:58 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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.

This is definitely not what we want our grandchildren and the other generations of people to inherit.

Sincerely,

Sincerely,  
Dr. Ann Clarkson  
5203 SE 38th  
Portland, OR 97202



**From:** [Fred Oswald](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:11:14 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Radioactive waste poses a significant hazard. 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 fuel—High 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, which is hazardous for 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 gamma emitter Nb-94 (half-life 20,000 years; hazardous for 200,000 to 400,000 years). Reactor internals closest to or part of the reactor core, such as the core shroud, are the most radioactive internal components..."

Don't 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,

Sincerely,  
Mr. Fred Oswald  
1520 Magnolia Ln  
Prescott, AZ 86301

**From:** [Frances Hinckley](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:05:46 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

I am very concerned about this:

Please, please 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 fuel—High 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...”

Don't 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 .

Thank you for your consideration and appropriate public protection action on this item.  
Sincerely,

Sincerely,  
Mrs. Frances Hinckley  
9 pepper  
corte mader, CA 94925

**From:** [Howard Cohen](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Tuesday, November 19, 2019 12:02:03 AM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

As a citizen and physicist, I urge you: 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 fuel—High 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...”

Don't 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,

Sincerely,  
Dr. Howard Cohen  
3272 Cowper St  
3272 Cowper Street  
Palo Alto, CA 94306

**From:** [marshall sanders](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:59:43 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Are you insane????????????????????

Sincerely,

Sincerely,  
mr marshall sanders  
2200 Adeline St., #250A  
250a  
oakland, CA 94607

**From:** [Beth Enson](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:55:23 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Are you out of your minds? You CANNOT bury super-hot and long-lasting radioactive waste (GTCC) in unlined ditches, right into the ground !!! I have been protesting nuclear power all my adult life because there is nowhere safe to store the waste for the 10,000 years it remains toxic to all life. But especially not safe right in the earth.

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 fuel—High 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...”

Don't 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,



Sincerely,  
Beth Enson  
PO Box 503  
Arroyo Seco, NM 87514

**From:** [Beth Enson](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:55:21 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Are you out of your minds? You CANNOT bury super-hot and long-lasting radioactive waste (GTCC) in unlined ditches, right into the ground !!! I have been protesting nuclear power all my adult life because there is nowhere safe to store the waste for the 10,000 years it remains toxic to all life. But especially not safe right in the earth.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Beth Enson  
PO Box 503  
Arroyo Seco, NM 87514

**From:** [Stephen M. Sachs](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:54:16 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

Frankly, to place high level radioactive materials in low level waste sites is illegal. and to do so contrary to law with such clearly dangerous material would technically constitute gross criminal negligence - which is punishable by law was it is outside the scope of office of any one in the agency. I would not want to risk making such a decision with its criminal liability.

Sincerely,

Sincerely,  
Dr. Stephen M. Sachs  
1916 San Pedro Dr NE  
Albuquerque, NM 87110

**From:** [Patricia Always](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:54:05 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. It would be unconscionable. It is much too dangerous.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Mrs. Patricia Always  
10511 W Kingswood Cir  
na  
Sun City, AZ 85351

**From:** [Robert McCombs](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:42:18 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

Since this material is so harmless, you should bury it in your front yards.

Sincerely,



Sincerely,  
Mr. Robert McCombs  
PO Box 4175  
164 Deer Fern Ln. Bayside (NO MAIL!)  
Arcata, CA 95518

**From:** [Nicole Miller](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:34:29 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Please, please do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called "low-level" waste sites.

Don't 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.

Let's play it as safe as we can.

Sincerely,  
Ms. Nicole Miller  
212 Seasons Trail  
Newport News, VA 23602

**From:** [James Cunningham](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:24:51 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

Do NOT allow super-hot and long-lasting radioactive waste (GTCC) to go into so-called “low-level” waste sites. American citizens should not be made guinea pigs in this misbegotten experiment with nuclear waste. And the stream of nuclear waste we now generate must be reduced with the goal of eliminating it entirely. We still have no clear, scientifically supported idea of what to do to safely store the waste we already have.

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 fuel—High 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...”

Don't weaken controls and protections over nuclear waste, especially as reactors close and are decommissioned and more GTCC waste is generated. The American public must be protected from being "nuked" by either industry or their own government.

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. The American People deserve much better than this.

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,

Sincerely,  
Mr James Cunningham  
938 Deacon Circle  
n/a  
Columbus, OH 43065

**From:** [Bruce Hlodnicki](#)  
**To:** [RulemakingComments.Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:22:34 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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. It is not appropriate or reasonable to bury this hazardous material in shallow land burial sites! Your "plan" to do so makes me question your intelligence and your judgement and your sanity. Because 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 fuel—High 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..."

Stop proposing stupid and dangerous plans! Stop weakening controls and protections over potentially deadly nuclear waste, especially as more reactors close and are decommissioned and more GTCC waste is generated!

Don't endanger Americans to save the nuclear energy industry money! Don't change the rules to allow a tremendous 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.

Stop pretending this deadly material 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,

Sincerely,  
Dr. Bruce Hlodnicki  
6235 LAWRENCE DR.  
INDIANAPOLIS, IN 46226

**From:** [Ross Lockridge](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:19:55 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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, Staff,

I don't think that hot, essentially ever-lasting nuclear waste (GTCC) should be transported and dumped into what's misnamed "low-level" waste sites.

I agree that 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 fuel—High 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..."

Again, don't weaken controls and protections over nuclear waste, especially as reactors close and are decommissioned and more GTCC waste is generated.

And do NOT change 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.

Please 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,

Sincerely,  
Mr. Ross Lockridge

12 Waldo St.  
Cerrillos, NM 87010



**From:** [Ruth Fink-Winter](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:18:43 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

I'm writing to urge you: please 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 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 fuel—High Burnup Fuel. I'm very concerned about shallow land burial, particularly near the Ogalalla Aquifer. I grew up in Nebraska drinking that water and carry its minerals in my bones. I am horrified at the thought of it being contaminated with radioactive waste.

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..."

Please don't weaken controls and protections over nuclear waste. This is particularly important as more nuclear reactors close, are decommissioned, and more GTCC waste is generated.

Please 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. That's more than 28 times the licensed amount; that's extremely irresponsible.

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 thousands of years it remains radioactively hazardous . Please protect the next generations of people growing up near the aquifer.

Sincerely,

Sincerely,  
Ms. Ruth Fink-Winter  
1635 Harwarden St  
Wheaton, IL 60187

**From:** [Carrie Schudda](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:16:53 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 . To do anything less would be to poison massive numbers of people. That would be inexcusable.

Sincerely,

Sincerely,  
Ms. Carrie Schudda  
510 Ash St.  
Oregon, WI 53575

**From:** [Susan Haywood](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:13:49 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

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 fuel—High 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...”

Don't 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 .

This is so dangerous. It will be in the dust and ground water if you store super-hot waste so carelessly.

Sincerely,

Sincerely,  
Ms. Susan Haywood  
2146 NW Everett St  
Portland, OR 97210

**From:** [Bob S](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste  
**Date:** Monday, November 18, 2019 11:11:07 PM

---

NRC rulemaking comments

RE: Docket ID NRC-2017-0081--Manage Greater-Than-Class-C nuclear waste as High-Level Waste

Dear ,

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:

The proposals just keep getting more alarming. People are realizing their responsibilities, and trying to run. If you let them, the children will pay and pay and pay and pay - you get the idea.

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 fuel—High 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...”

Don't 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,

Sincerely,  
Mr. Bob S  
Box 913  
Spiritwood, SK S0J 2M0