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November 19, 2019

Secretary
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Docket ID NRC-2017-0081

To Whom It May Concern:

The Executive Board (Board) of the Organization of Agreement States (OAS) has the following comments on the regulatory basis for Disposal of Greater-than-Class C (GTCC) and Transuranic Waste.

The Board would like to support the comments of the Low-Level Radioactive Waste Forum and the states of Washington and Utah. The Board concurs that the regulations for the disposal of GTCC and Transuranic waste should be folded into the proposed Part 61 rulemaking as a single rulemaking because of the inherent benefit of integrating both rulemaking efforts. This could also serve to ensure that compacts and sited states can address the Part 61 changes in a single, more coordinated and consolidated effort. This would allow a sited state to address specific state policy considerations regarding such unique wastes in a similar manner.

We appreciate the opportunity to provide these comments and stand ready to answer any questions you may have.

Sincerely,

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Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Vermont, Virginia, Washington, Wisconsin, Wyoming