

SUNSI Review Complete
 Template = ADM-013
 E-RIDS=ADM-03
 ADD: Marlayna Doell

As of: 3/27/20 7:36 AM
Received: March 26, 2020
Status: Pending_Post
Tracking No. 1k4-9fru-qa1m
Comments Due: April 20, 2020
Submission Type: Web

PUBLIC SUBMISSION

COMMENT (3)
 PUBLICATION DATE:
 3/6/2020
 CITATION 85 FR 13076

Docket: NRC-2020-0065

Transfer of Very Low-Level Waste to Exempt Persons for Disposal

Comment On: NRC-2020-0065-0001

Transfer of Very Low-Level Waste to Exempt Persons for Disposal

Document: NRC-2020-0065-DRAFT-0003

Comment on FR Doc # 2020-04506

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General Comment

RE: Docket ID NRC-2020-0065

GENERAL GARBAGE DUMPS AND NON-NUCLEAR HAZARDOUS WASTE DUMPS ARE NOT EQUIPPED TO HANDLE NUCLEAR WASTE. PUTTING NUCLEAR WASTE IN SUCH PLACES IS A HEALTH RISK AND A SECURITY RISK.

Landfill operators must not be permitted to receive nuclear waste unless they are a licensed receiver of nuclear material and any new licenses must have the same requirements as before. Anything else is an extreme risk for an unimaginable amount of time and also could be a far more short term risk if the material fell into the wrong hands and was used to make any kind of weapons by criminals or terrorists. Ordinary dumps don't have the security in place to keep nuclear waste from being stolen.

Think of the logistical problems in allowing these so called "specific exempt" landfills-

What are the specific criteria for this so called "very low-level waste"?

How would untrained staff even know if nuclear waste taken there met the criteria?

How would staff and people living near &/or using the dumps protect themselves from nuclear contamination?

How would the nuclear material be contained during a disaster such as floods, earthquakes, tornadoes and other extreme conditions?

How could a non-licensed dump afford the protective measures and training needed?

How would people in the area know if their area landfill was taking the nuclear waste?

How would people have input into allowing nuclear waste to come into the area landfill?

How would people be able to object to having nuclear waste come into a landfill, especially a privately operated one?

How to prevent a proliferation of un-licensed dumps that accept nuclear waste if this regulation is passed?

Will NRC staff be expanded to inspect such dumps to make sure nuclear material is being safely handled?

How will staff even keep track of where material goes?

How will nuclear waste be transported and labeled?

How will it be isolated at the dump so that it isn't incinerated or otherwise improperly treated?

How will it be kept safe from theft?

Pardon my plain speaking but it seems that these regulations are industry-driven in an attempt to literally dispose of a problem that they don't want to take responsibility for. The nuclear industry and power utilities are already given plenty of government help. Allowing radioactive waste into unlicensed facilities is not a viable solution. There is already enough contamination from general and non-nuclear hazardous waste dumps, due to improper handling and leakage. There are already leakages and contamination from nuclear waste. Keep the problems separate instead of compounding the risks to health and security.

Sincerely,
Dorah Shuey