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**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-0010

Comment on FR Doc # 2020-04506

## **Submitter Information**

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## **General Comment**

I urge you to not pursue this interpretive rule change to give "specific exemptions" to landfill operators to accept and store radioactive waste during the COVID-19 public health crisis. In fact I oppose any regulatory change to allow radioactive waste go to regular landfills and hazardous waste sites.

This may save money in the short term but will cause significant harm to our communities and leave the cleanup to future generations. This would not be just or fair, shifting the burden to Americans with no money, no power, and to future generations who will have no choice but to clean it up.

This is not a case of NIMBY; radioactive waste should not be in ANYONE's backyard or transported through communities.

Americans need answers to these questions in order that we are appropriately informed of what we could be facing:

- 1) Who is liable for radioactive waste in a "specific exempt" facility?
- 2) How will we know if our local landfill is considering becoming a "specific exempt" thus able to take nuclear waste?
- 3) What specific criteria must it meet? What public process will take place? How can the public know and how can community members intervene?
- 4) How much waste overall is expected to go to regular or hazardous sites over time?

- 5) What about protecting Americans and preventing radioactive exposure? How much money will be saved from decommissioning funds by enabling this exemption process?
- 6) How does NRC plan to track exempt sites to make sure their conditions are being met over time?
- 7) How will it be identified in transport?
- 8) How will it be identified to prevent incineration or recycling?
- 9) How do NRC or states enforce the conditions for exemption that the dump claims to meet?
- 10) Will each dump have its own radioactive section or will they spread it all over?
- 11) Can you name one landfill in this country that has NOT LEAKED?