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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

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General Comment

In my attempt to better understand the impact of this proposed change I have the following questions I'd sincerely appreciate be answered publicly. I'm asking with no preconceived notion if the proposed change is appropriate or inappropriate, but is predicated on WHY such a change is necessary, appropriate and/or an improvement over the current process. That stated, it is concerning that something deemed as "Radioactive" may be disposed of in a traditional public landfill.

- 1 - What is the definition of "Very Low-Level Radioactive Waste?" Is there a measurement criteria for radiation or a list of equivalent household / industrial products that share these "very low-levels?"
- 2 - Who are the current "Licensees" that are generating this "very low-level" material?
- 3 - What is the current disposal protocol for these materials?
- 4 - Why were these "very-low level" items originally included in this protocol?
- 5 - What is the driving factor animating this proposed change in disposal protocol (expanded list of commonly used materials that meet the "very low level" definition thus requiring a specific change for storage capacity, economic / cost driven, new / improved land burial technology)?
- 6 - What are the "specific exemptions for the purpose of disposal" and who are these "exempt persons" who, under the rule change, can dispose of these materials via land burial?
- 7 - What, if any, standards are to be met or required of those "exempt persons" and/or the designated disposal site to safely dispose of this "very low-level" material? Is the generator required to keep records on the chain of custody and/or manifest the transportation and disposal of the "very low-level" material for purposes of

tracking and reporting compliance?

8 - What, if any, environmental impact studies have been conducted to evaluate this potential change and what are the findings?

Respectfully,
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