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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-0077

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## Submitter Information

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## General Comment

RAM Licenses should already include licensee-specific criteria for unrestricted release. These criteria are never "zero", but are typically based on negotiated license conditions according to already established regulatory guidance. Exempt quantities and general use are already codified in the Standards. My initial reading of the proposed Rule seems to indicate a loophole to allow Licensees to bypass their license conditions regarding unrestricted release. As such, this rule, in my opinion, is not needed, and not in keeping with good regulatory practices. It also creates an additional layer of regulation that potentially complicates compliance for licensees.