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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-0104

Comment on FR Doc # 2020-04506

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General Comment

To All Concerned,

Re: Docket ID: NRC-2020-0065 Agency: Nuclear Regulatory Commission (NRC)

I am worried about and oppose the NRC proposal to change the interpretation of LLRW disposal regulations, but primarily for a reason that might not be obvious. The nuclear industry is at an important juncture in world history. We have reached the point where climate change is well documented and obvious to any observer. A "chaotic climate" is already showing signs of having significant negative impacts on this planet. Without switching to mostly carbon-free energy sources, we have no chance of slowing or reversing this trend. Nuclear energy is the only carbon-free baseload energy source that can replace the bulk of fossil fuel burning power plants.

With that in mind, we should all be working toward educating the public about the positive side of nuclear energy (safest by far among baseload energy sources), the availability of GEN III and GEN IV nuclear reactors that can safely and passively shut themselves down in an emergency, and the importance of nuclear energy in mitigating climate change. Our goal should be to support the construction of new nuclear energy plants around the country. Anything that distracts from that goal, or worse puts it in a negative light, should be avoided.

Which brings us to this NRC proposal, a change that will only give the nuclear industry negative PR. It appears that this suggestion has flown mostly under the radar, quite possibly because of the current pandemic.

However, it won't take many news reports of "Radioactive Waste Being Dumped in Local Solid Waste Facility" to create a major public outcry. And if you don't think the general public will confound LLRW with nuclear energy issues, you haven't been reading all of the public comments already posted here. Your timing could not be much worse.

So, what is the rush on this proposal? There is no reason to rush this decision and many reasons not to rush it. I was glad to see that you delayed the deadline for comments until July, but even that is too soon. I assume the goal of this proposal is cost savings (not a bad thing) because nothing else would make sense. Is it an issue of reducing transportation costs since we currently have so few LLRW facilities? If so, has a comparison been done with the cost savings of increasing the number of LLRW facilities? All options should be considered before this decision is made.

Finally, I see that the NRC is also considering other changes that could bring negative press to the nuclear industry. I suggest moving very carefully on proposals to increase the allowed work hours of nuclear power plant operators, delaying nuclear power plant inspections, and approving the transfer of the cleanup of TM-2 to a third party. I sure hope that last issue is not related to the LLRW proposal. Be sure you are making decisions that are in the best interest of the public in each of these cases. It is not an exaggeration to say that our future may depend upon it. Thank you for taking the time to read this.