From: n Le Baron <nlebaron@mac.com>
Sent: Thursday, May 28, 2020 1:21 PM
To: VLLWTransferComments Resource
Subject: [External_Sender] No Radioactive Waste In Our Landfills

Nuclear Regulatory Commission (VLLW)

RE: No Radioactive Waste In Our Landfills

Dear ,

To the NRC Commissioners, Staff, VLLW Docket NRC-2020-0065, and Members of Congress:

Keep radioactive waste under control--Do NOT send it to regular or hazardous waste sites. Rescind the VLLW proposal and continue requiring all handlers of nuclear waste to have a specific radioactive license, not "specific exemptions."

The VLLW plan is really Very Large Lies about nuclear Waste--it threatens worker and public health and environment and is a direct subsidy to nuclear power and the whole nuclear power and weapons fuel chain...part of the relapse to nuclear power. It shifts liability from nuclear waste makers and dumpers to the public and workers.

Entire nuclear power reactors-buildings, concrete, soil, metal components, pipes and more become radioactive waste during nuclear power production. Massive amounts of nuclear waste and radioactivity would be released as if not radioactive to places without training or licensing to handle it. To become "specific exempt," the landfill operator or nuclear waste-maker answers 5 short questions for permanent exemption--with no requirements to maintain records, report, or monitor and no limit on the amount of nuclear waste it brings in.

VLLW is not just "slightly contaminated" waste--it would allow ALL the waste (maybe even more) that now goes to licensed nuclear waste sites to go to regular garbage. The allowable level is high and not enforceable or verifiable. It allows doses of 25 millirems/year which over a lifetime means 1 in 500 people will get cancer from the exposure. And there is no limit on the number of "specific exempt" sites or waste streams so the risk could be even higher. There is no safe level and this is in addition to background.

Stop all efforts to let nuclear power waste go to our landfills, incinerators (which cannot destroy radioactivity), recycling streams for consumer goods or any other places that are not licensed for radioactive waste and materials. NRC "intends" for waste to only go to landfills but this "reinterpretation" opens the floodgates to radioactive zippers, frying pans and baby toys which the public has rejected dozens of times over decades.

The VLLW proposal threatens workers and members of the population (women and children disproportionately). Workers at landfills, recycling centers, metal facilities and in transport would be

exposed to the bulk of nuclear power decommissioning waste without knowledge, consent or basic protection.

Communities won't know if their local landfills are taking nuclear waste because NRC has no requirement for public notice.

No secrets--If the NRC proceeds, against public opposition, it must publicly announce which facilities are applying to take nuclear waste and provide meaningful opportunity for public input and intervention as well as an Environmental
Impact Statement.

This proposal is much worse than the similar Below Regulatory Control policies that Congress revoked. Revoke the VLLW "interpretation."

NRC has not reported an estimate of the amount of radioactivity that this proposed "reinterpretation" of its rules would release. This is more than a reinterpretation--It is a major reversal of policy and a major federal action requiring Environmental Impact Statements--both Programmatic and site specific for each landfill or other place that would take the waste.

Do not authorize any person, landfill or facility as "Specific Exempt" as proposed in this VLLW reinterpretation of NRC rules.

Redirect NRC resources to better isolation, not release of radioactive wastes.

Sincerely,
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MESSAGE	3756	5/28/2020 1:20:52 PM

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