From: Joan Lobell <ojdart@fastmail.fm>
Sent: Friday, July 17, 2020 1:13 AM
To: VLLWTransferComments Resource
Subject: [External_Sender] Reject nuclear waste in landfills--VLLW reinterpretation

Nuclear Regulatory Commission (VLLW)

RE: Reject nuclear waste in landfills--VLLW reinterpretation

Dear ,

To the NRC VLLW Docket NRC-2020-0065

Reject nuclear waste in landfills--VLLW reinterpretation

Since entire nuclear reactors become radioactive or get contaminated with radioactivity as a routine part of making electricity, all that waste is licensed radioactive material and waste.

I support the CURRENT interpretation of US nuclear regulations that require that licensed nuclear material and waste to be in the possession of persons who have licenses under the Atomic Energy Act to handle and dispose of nuclear waste. I suggest that it all be stored in the grounds of the estates of the power plant owners who created it's existence and made the highest profits from it.

I oppose the VLLW plan to reinterpret the rules to let nuclear waste go to places without a nuclear license.
Managing the waste from nuclear power must remain the responsibility, legally and financially, of the licensed entities that made that waste.

I do not want nuclear waste in my or other communities' local landfill or other properties. Nor should it go to hazardous or industrial waste sites where the radioactivity can react with other chemicals and make public exposures and releases potentially more harmful than they are already. Not to recycling or incinerators or other unregulated places.

This VLLW proposal would allow potentially entire nuclear reactors to be dumped or left as if not radioactive.

I object to the secretive nature of this whole process including the failure to require notification of or opportunity for communities to intervene when their landfill or other facility is applying or approved as "specific exempt."

There is no requirement or mechanism to verify or enforce the kinds and amounts of waste and leakage.

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 could cause

cancer 1 in 500 people from the exposure over their lifetimes. And much suffering by others for the rest of their lives.

This proposal is even more bold and expansive than the similar Below Regulatory Control policies that the public and Congress revoked in the 1990s for sane reasons.

Can states and local governments reject or must they adopt this reinterpretation? Especially when it is supposedly voluntary?

Do not proceed with this "interpretive" rule change which really is a complete reversal in regulation requiring environmental impact statements nationally and at each site.

Keep nuclear waste under nuclear regulatory controls. It was insane to create nuclear power plants in the first place.

Thank you,

Sincerely,
Ms. Joan Lobell
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Federal Register Notice: 85FR13076
Comment Number: 4333

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Subject: [External_Sender] Reject nuclear waste in landfills--VLLW reinterpretation
Sent Date: 7/17/2020 1:12:31 AM
Received Date: 7/17/2020 1:12:35 AM
From: Joan Lobell

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