

From: L. Watchempino <5000wave@gmail.com>
Sent: Saturday, July 18, 2020 10:48 PM
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

Because entire nuclear reactors routinely become radioactive as a function of generating electricity, all parts of the reactors and spent fuel parts must be licensed as radioactive material and waste.

I support the CURRENT interpretation of US nuclear licensing regulations that require all nuclear material and waste to be in the possession of persons who have licenses under the Atomic Energy Act to properly handle and isolate nuclear waste.

I oppose the VLLW plan to reinterpret the rules to allow some nuclear reactor waste to be siphoned off to exempt landfill operators for disposal in our local landfills without a nuclear license.

All radioactive waste from nuclear power generation is long-lived and must not be commingled with regular household trash where it can infiltrate our groundwater and become airborne, creating new exposure pathways for residents near and far. Nuclear waste generated by the licensed owners of nuclear facilities must remain in their stewardship until a plan for deep geologic disposal is vetted and approved by regulators. Nuclear plant owners and operators must be fully apprised of the legal and financial obligations they are undertaking in their nuclear materials licenses and the NRC acts contrary to its mission to protect human health and the environment from long-lived radioactive materials and waste,

remain the responsibility, legally and financially, of the licensed entities that made that waste.

I do not want to promote the dangerous practice of mixing nuclear waste with household trash in my local landfill or in other places where it is not properly isolated and managed forever. Nor should nuclear waste be disposed of at hazmat, industrial waste sites, or other unregulated places where they can interact with other hazardous materials, creating a greater public health risk and subjecting unsuspecting members of the public to repeated exposure along the transport routes.

I object to the secretive nature of this whole process, including the failure to require public notification and opportunities for communities to intervene when their local landfill or another facility applies to NRC for approval as "specific exempt."

There is no requirement or mechanism to account for the volume and type of low level waste that ends up in our landfills, or best practice to isolate the waste and prevent releases to air, soil, and groundwater.

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 be rerouted to regular unlined garbage dumps. This ill-advised proposal could result in 1 new cancer out of 500 people from this additional exposure pathway over a lifetime - that's one cancer too many.

This proposal goes even further than a similar Below Regulatory Control policies that the public and Congress revoked in the 1990s.

The protection of human health and the environment requires that ALL nuclear waste be geologically isolated and managed in perpetuity.

Thank you,

Sincerely,
Ms. L. Watchempino
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Pueblo of Acoma, NM 87034
(505) 552-6327

Federal Register Notice: 85FR13076
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Subject: [External_Sender] Reject nuclear waste in landfills--VLLW reinterpretation
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