

From: Judy Lukasiwicz <jsteel@cruzio.com>
Sent: Saturday, July 25, 2020 6:56 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

Entire nuclear reactors become radioactive or get contaminated with radioactivity as a routine part of creating nuclear powered electricity generation. As a result, all this type of nuclear waste is licensed radioactive material and waste.

I agree with and support the CURRENT interpretation of US nuclear regulations that require that licensed nuclear material and waste be in the possession of persons who have licenses under the Atomic Energy Act to handle and dispose of radioactive nuclear waste.

I completely oppose the VLLW plan to reinterpret the rules to let nuclear waste go to places that do not hold a required nuclear license. Managing the waste from nuclear power must remain the responsibility, legally and financially, of the licensed entities that created that waste.

Hazardous, radioactive nuclear waste does not belong in local community landfills or other community properties. Hazardous or industrial waste sites are also not appropriate for radioactive waste dumping, as the radioactivity can react with other chemicals and increase public exposures and radioactive releases leading to more dangerously harmful contamination impacts on humans, land/soil, groundwater, air, wildlife, etc. Radioactive nuclear waste has already been shown to be highly dangerous (radioactive half-life) for multiple centuries, therefore, it is unwarranted and unsafe to place this waste in facilities meant for recycling, trash incineration or other non-NRD-regulated trash disposal sites.

This unsafe and irresponsible VLLW proposal would attempt to potentially allow entire radioactive nuclear reactors to be dumped or left as if the materials were not highly and dangerously radioactive. This is clearly unacceptable.

I also 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 might be unaware of dangers, and therefore applying for (or even approved as) "specific exempt." Nuclear waste is toxic, harmful and a hazard to health in any community. Dumping it into unsuspecting communities without

the ability protect the environment and/or the public, with no ability to safely store this waste for long term, etc., is completely irresponsible.

There is no requirement or mechanism included to verify or enforce the kinds and amounts of radioactive waste and leakage inherent in long- and/or short-term hazardous, radioactive waste storage/disposal.

VLLW is not just "slightly contaminated" waste--it would allow ALL (and conceivably more) the waste that now goes to licensed nuclear waste sites to go to regular garbage disposal facilities. The 'allowable level' of radioactive waste material is already considered a strong carcinogen--and would facilitate cancer in people and animals from the proposed nearby radioactive exposure sites over their lifetimes.

This proposal is even more irresponsible and expansive than the similar "Below Regulatory Control" policies that the public and Congress revoked in the 1990s. Nuclear waste cannot be safely stored. That much is widely known. The answer is not to dump radioactive waste in communities across the nation without letting the public have a voice in their health and safety, but to ban the inefficient and expensive use of nuclear power generation in the USA. As well we must mandate that nuclear power companies prepare sites on their properties that provide thoroughly government tested, safe, long-term methods of storing remaining highly toxic radioactive waste.

--Can states and local governments reject, or must they adopt, this reinterpretation? This question is not being considered nor answered within this proposal, yet it appears that private corporations' nuclear waste disposal in local community landfills, etc., is supposedly voluntary. (?) --If, as in this unclear and unsound proposal, our nation's public communities are meant to remain uninformed and used as part of nuclear companies' dumping grounds, this is unacceptable and a horrific threat to public health and well-being. Keeping the public uninformed does not match with the idea of communities voluntarily accepting radioactive nuclear waste dumping in their landfills (public or private)... for any amount of money.

Do not proceed with this "interpretive" rule change. This change is an unwarranted, complete reversal of the current regulations requiring environmental impact statements nationally, and at each site.

Keep nuclear waste under nuclear regulatory controls.

Overall, we must stop creating nuclear waste in a society already dealing with health crises from a global health pandemic and the widespread health and economic impacts of pollution-based global climate change.

Thank you,

Sincerely,
Ms. Judy Lukasiewicz
701 Happy Valley Rd
Santa Cruz, CA 95065
(831) 423-4606

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