

From: Maia Maia <Maia@impulse.net>
Sent: Wednesday, October 14, 2020 5:33 PM
To: VLLWTransferComments Resource
Subject: [External_Sender] Docket NRC 2020-0065 Transfer of VLL (Radioactive) Waste to Exempt Persons for Disposal

Dear U.S. Nuclear Regulatory Commission (VLLW),

Dear NRC Commissioners and Staff:

We strongly object to the Nuclear Regulatory Commission's (NRC) proposed reinterpretation of the rules allowing radioactive waste to go to persons and places without radioactive licenses Docket NRC 2020-0065!

It is very dangerous indeed to release radioactive waste to places without nuclear regulatory control. Do not give "specific exemptions" to entities to take radioactive waste, regardless of what permits they might have for other waste.

Keep all nuclear waste out of our communities, solid and hazardous waste landfills and incinerators, processing and recycling centers. Hazardous waste sites are not designed to isolate radioactive materials and the health and environmental dangers could be exponentially worse than each on their own.

This is an illegal, immoral way to bring about radical change in radioactive waste policy. NRC is trying to bypass normal rulemaking procedures of both NRC and the Administrative Procedures Act; proposing policy change that will make it difficult, or impossible, for the public or state regulators to track radioactive waste. So-called "very low-level waste" or VLLW is a lie, since it could result in release of intensely radioactive waste despite NRC's claimed "intent." This proposal is clearly designed to circumvent state laws requiring regulatory control over ALL LEVELS of radioactive waste in their states.

once NRC puts this interpretation in place, states could be able to virtually deregulate radioactive waste disposal as well, meaning that the concerned public must be ever-vigilant to every action of both federal and state regulators who could be releasing nuclear waste with no public notice.

NRC wants to allow the same amount of radioactive emissions from unregulated "specific exempt" sites as from operating nuclear power reactors and waste dumps! This is WRONG. No level of "millirems" is acceptable because they are not verifiable or enforceable.

Keep nuclear waste under lock and key and out of solid and hazardous waste sites, whether landfills, incinerators, or recycling.

Sincerely,

Sincerely,
Maia Maia

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