

**From:** Laura Watchempino <5000wave@gmail.com>  
**Sent:** Wednesday, October 14, 2020 8:37 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:

I object to the Nuclear Regulatory Commission's (NRC) proposed reinterpretation of the rules which would allow radioactive waste to go to persons and places without radioactive licenses Docket NRC 2020-0065. Do not release radioactive waste to places without nuclear regulatory control. Do not give "specific exemptions" to entities to take radioactive waste, regardless of what other permits they might have for other kinds of waste.

Keep nuclear waste out of our communities, solid and hazardous waste landfills and incinerators, processing and recycling centers. I especially object to sending nuclear waste to hazardous waste sites because those sites are not designed to isolate radioactive materials and the synergistic effects of combining hazardous materials with radioactive waste could be exponentially worse than each separately.

I object to the way in which the NRC is trying to make this radical change in radioactive waste policy. NRC is attempting to bypass normal rulemaking procedures of both NRC and the Administrative Procedures Act by proposing a policy change that will make it difficult, or even impossible, for public and state regulators to track radioactive waste. Calling radioactive waste "very low-level waste" or VLLW is really a very large lie that would disseminate radiation releases across vast segments of our nation's population. The proposal is clearly designed to circumvent over a dozen state laws requiring regulatory control over all levels of radioactive waste in their states.

Fortunately, some states will not allow the release of nuclear waste to regular trash, recycling, incinerators or hazardous facilities. But elsewhere, it will be virtually impossible to track what happens with the waste generated at nuclear power plants other than irradiated (spent) fuel. In fact, once NRC puts this new policy in place, states could also deregulate radioactive waste disposal without ever notifying the public about this new exposure pathway.

NRC is also proposing to allow other "specific exempt" sites to receive radioactive materials without being licensed. This is unacceptable because no amount of radiation exposure is safe and radiation exposures accumulate in each person over a lifetime. People should not be subjected to any amount of radiation exposure without their knowledge or consent.

Reject the VLLW proposal and all others that permit unregulated radioactive releases to the environment, . Keep nuclear waste under lock and key where it can be verified, and out of our landfills, incinerators, and recycling facilities.

Thank you,

Sincerely,  
Laura Watchempino  
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