

From: Laura Mebert <laurajor@gmail.com>
Sent: Wednesday, October 14, 2020 10:35 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 Sen. Peters,

Congress must act to curb NRC's proposed reinterpretation of rules that would allow radioactive waste to go to persons and places without radioactive licenses (Docket NRC 2020-0065). It is a bad idea to release radioactive waste to places without nuclear regulatory control or to grant "specific exemptions" for entities that may have permits for other kinds of waste to take on radioactive waste. Radioactive waste is very dangerous. Without strict regulatory control, radioactive waste can and will cause unnecessary, avoidable, easily-foreseeable, easily-preventable harm to public health. It would take only one accident or (heaven forbid) one person with ill intent to cause large-scale harm.

Public health requires that nuclear waste be kept out of our communities, our solid and hazardous waste landfills and our incinerators, processing and recycling centers. Hazardous waste sites are not designed to isolate radioactive materials, and the health and environmental "multiplier effects" of combining hazardous and radioactive materials in the same facility could be exponentially worse than each on their own.

The manner in which NRC is trying to effectuate this change in radioactive waste policy violates due process. NRC is procedurally attempting to bypass normal rulemaking procedures of both NRC and the Administrative Procedures Act. It is proposing a change in policy that will make it difficult, if not impossible, for the public or state regulators to track radioactive waste. This approach is clearly designed to circumvent over a dozen state laws requiring regulatory control over all levels of radioactive waste in their states.

If the rule is re-interpreted as proposed, then in most states, it will be virtually impossible to track the movement of potentially all nuclear power waste other than irradiated (spent) fuel. 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. No one has time for that. Non-specialist citizens have a right to go about their lives without having to personally monitor their surroundings for radiation leaks.

NRC is proposing to allow same amount of radioactive emissions from unregulated "specific exempt" sites as from operating nuclear power reactors and waste dumps. This is unacceptable for public health and safety reasons.

Furthermore, calling this waste "very low-level waste" is a misnomer. It is an inaccurate euphemism that ignores the scientific evidence of the serious risk that the referenced waste

poses. No quantity of "millirems" is acceptable because such emissions are neither verifiable, enforceable, nor necessary.

Reject the VLLW proposal. Nuclear waste must be kept under lock and key and out of solid and hazardous waste facilities.

Sincerely,

Sincerely,
Laura Mebert
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