

From: Larry McFall <mcfallmusic@comcast.net>
Sent: Thursday, October 15, 2020 12:00 AM
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.

I object to sending nuclear waste to hazardous waste sites. Those sites are not designed to isolate radioactive materials. The combined health and environmental effects of both hazardous and radioactive materials could be exponentially worse than each on their own.

I object to this illegal, immoral, radical change in radioactive waste policy. NRC is procedurally attempting to bypass normal rule making procedures of both NRC and the Administrative Procedures Act. You are proposing a change in policy that will make it difficult, or even impossible, for the public or state regulators to track radioactive waste. **THE SO-CALLED "VERY LOW-LEVEL WASTE" OR VLLW IS A LIE** that will result in the release of intensely radioactive waste despite NRC's claimed "intent." The proposal is clearly designed to circumvent over a dozen state laws requiring regulatory control over all levels of radioactive waste in their states.

For the majority of the country, it will be virtually impossible to track what happens with potentially ALL of the nuclear power waste other than irradiated (spent) fuel. Once the NRC puts this interpretation in place, states could be able to virtually deregulate radioactive waste disposal, releasing nuclear waste with no public notice.

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

Reject the VLLW proposal. Keep nuclear waste out of solid and hazardous waste sites, whether landfills, incinerators, or recycling.

Sincerely,

Sincerely,
Larry McFall

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