

**From:** Ned Flaherty <Ned\_Flaherty@msn.com>  
**Sent:** Thursday, October 15, 2020 2:55 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 un-licensed persons and places (Docket NRC 2020-0065).

Do not release radioactive waste to un-regulated places.

Do not give "specific exemptions" to entities for taking radioactive waste, regardless of what other waste is permitted.

Keep nuclear waste out of our communities, solid / hazardous waste landfills, incinerators, and processing / recycling centers.

I OPPOSE sending nuclear waste to hazardous waste sites that are not designed to isolate radioactive materials, especially since the combined health and environmental effects of hazardous and radioactive materials could be exponentially worse than each one individually.

I OPPOSE the illegal, immoral way the NRC is trying to adopt this radical change in radioactive waste policy. NRC is trying to bypass normal rulemaking procedures of both NRC and the Administrative Procedures Act. In practical terms, it is proposing a policy change that would make it difficult or impossible to track radioactive waste. This so-called "very low-level waste" or VLLW is really a very large lie about nuclear waste, as it could result in release of intensely radioactive waste despite NRC's claimed "intent." Also, this proposal circumvents over a dozen state laws requiring regulatory control over all levels of radioactive waste.

Some states do not allow the release of nuclear waste to regular trash, recycling, incinerators, or hazardous facilities, but everywhere else, it will be virtually impossible to track what happens with potentially ALL of the nuclear waste other than irradiated (spent) fuel. Once this proposed change occurs, states could virtually deregulate radioactive waste disposal as well, thus forcing concerned citizens to stay ever-vigilant to every regulatory action that releases nuclear waste with no public notice.

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

Reject the VLLW proposal, and all others that would release nuclear waste from radioactive

controls.

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

Sincerely,

Sincerely,  
Ned Flaherty  
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