

**From:** Ruth Fink-Winter <ruth.finkwinter@gmail.com>  
**Sent:** Friday, October 16, 2020 1:31 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. Radioactive waste should not be sent to places without nuclear regulatory control; it is a different type of waste which is dangerous for a much longer time than any other type of waste. 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 combined health and environmental effects of both hazardous and radioactive materials could be much worse than each on their own. Dioxin is bad. Radioactively contaminated dioxin is worse.

I object to the way the NRC is trying to effectuate this radical change in radioactive waste policy - it is, simply put, against the law. The proposal is clearly designed to circumvent over a dozen state laws requiring regulatory control over all levels of radioactive waste in their states. NRC is procedurally attempting to bypass normal rulemaking procedures of both NRC and the Administrative Procedures Act. This proposed policy change would make it difficult or impossible for the public or state regulators to track radioactive waste. This so-called "very low-level waste" (VLLW) could result in the release of intensely radioactive waste despite NRC's claimed "intent." Science doesn't care about good intentions.

Some states will not allow the release of nuclear waste to regular trash, recycling, incinerators or hazardous facilities. Unfortunately for the rest of us, in the majority of the country, it will be virtually impossible to track what happens with potentially ALL nuclear power waste other than irradiated (spent) fuel. With this interpretation in place, states could 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. It's hard enough to keep track of this at the national level.

NRC's proposal to allow the same amount of radioactive emissions from unregulated "specific exempt" sites as from operating nuclear power reactors and waste dumps is also unacceptable.

Please act to reject the VLLW proposal and all others that would release nuclear waste from radioactive controls. Keep nuclear waste out of solid and hazardous waste sites, whether landfills, incinerators, or recycling.

I look forward to your reply.

Sincerely,

Sincerely,  
Ruth Fink-Winter  
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