

From: tara wheeler <tara@thebaldwinlawfirm.com>
Sent: Tuesday, October 20, 2020 5:15 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 combined health and environmental effects of both hazardous and radioactive materials could be exponentially worse than each on their own.

I object to the illegal, immoral way the NRC is trying to effectuate this radical change in radioactive waste policy. NRC is procedurally attempting to bypass normal rulemaking procedures of both NRC and the Administrative Procedures Act; and in practical terms, proposing a change in policy that will make it difficult, or even impossible, for the public or state regulators 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." 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 for a few of us, some states will not allow the release of nuclear waste to regular trash, recycling, incinerators or hazardous facilities. But 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. In fact, 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.

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 and furthermore, no amount of "millirems" is 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.

We were better at one time. Through the years, everything has been done quicker, easier, cheaper, at the cost of the environment. We need to think of ways to reverse this trend, & help the earth & thus everyone else in the long run.

Don't forget about cutting back our carbon footprint. (and all that entails, including reduce, refuse, reuse, recycle, compost—when you can safely, & living as simply as possible, cutting back on excess, downsizing, etc . . .).

I'm trying, but I think we could do more to encourage others around the world. Including setting a good example ourselves. I'm not sure Trump did the wrong thing. I was not in favor of the Paris Agreement for my own reasons, and I am a tree hugger. I also love this planet & all in it. but the nuclear option could blow it for all of us. (making it worse than it could ever get—because nuclear energy is very dangerous) I sometimes wonder about people who are pushing for the nuclear option. Do they just not know the past mishaps? do they have too much trust in humanity? do they not think of terrorism or other such deeds? Not to mention natural disasters?, etc . . . I think that was a mistake. It, nuclear energy, should not have been included in the answer to our problems. & I worry that this is buried in this Green New Deal as well.

Another problem is that Haste Makes Waste & many times in our urgency to do good we move too fast for our own good & the good of others. Someone may suffer as a result & there may be no quick remedies before much suffering by many. So we need to take it slow by testing small areas first & then progressing, realizing that some things will not show up right away. But the first steps above could start earlier. But in any case we need to realize that we may need to make changes for the best of all.

This is the best time to realize that all people, animals, beings/creatures, spirits, etc . . . dwell in the same space: Earth. We are the past, present, & future. We are all above, below, on and or in the earth. It is the home of us all & we all need each other whether we know it or not. We should make all plans keeping the future of all in mind. We are all connected, so what we do in one part of the world will eventually get to another.

& I hope you will join me in praying for the president & that he & his team will realize our wishes & understand they are for his benefit as well as the benefit for everyone else in the long run.

If you'd like, you could pass on my wishes to him as well.

I share a variety of perspectives. no matter who we are or where we came from, we can thank God that we are here & that we do have a lot to be thankful for.

Maybe not as much as some. But a lot more than others. yes, there are times when I feel worse than others, that happens to all of us, no matter who we are. But thank God we are here. We can also agree to disagree on many issues. That's life.

The whole point is that we are all here, thank God, & we all have life, & we all are together.

Happy Fall!

Stay safe & Take care & God Bless All . . .

Sincerely,

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Federal Register Notice: 85FR13076
Comment Number: 13296

Mail Envelope Properties (55b2f806-9174-491f-b41f-57d10836c1b3)

Subject: [External_Sender] Docket NRC 2020-0065 Transfer of VLL (Radioactive) Waste to Exempt Persons for Disposal
Sent Date: 10/20/2020 5:14:35 PM
Received Date: 10/20/2020 5:14:37 PM
From: tara wheeler

Created By: tara@thebaldwinlawfirm.com

Recipients:

Post Office: salsalabs.org

Files	Size	Date & Time
MESSAGE	6044	10/20/2020 5:14:37 PM

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