From: Scott Kovac <scott@nukewatch.org>
Sent: Wednesday, October 21, 2020 4:32 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.

Sincerely,

Sincerely,
Scott Kovac
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Federal Register Notice: 85FR13076
Comment Number: 13623

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