

From: Joni Arends <jarends@nuclearactive.org>
Sent: Wednesday, October 21, 2020 8:06 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 also object to sending nuclear waste to hazardous waste sites because 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 comment period taking place during the global COVID-19 pandemic. I also 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 the normal rulemaking procedures of both NRC and the Administrative Procedures Act. In practical terms, NRC is 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. The proposal is clearly designed to circumvent over a dozen state laws requiring regulatory control over all levels of radioactive waste in their states - including New Mexico.

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, if NRC's interpretation is put in place, states could be able to virtually deregulate radioactive waste disposal as well. As a result, 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 and opportunity to provide comments.

Further, 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. This is unacceptable, unconscionable, and irresponsible. 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,
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Federal Register Notice: 85FR13076
Comment Number: 13652

Mail Envelope Properties (827316be-5533-4c4d-92a9-f971862f019e)

Subject: [External_Sender] Docket NRC 2020-0065 Transfer of VLL (Radioactive) Waste to Exempt Persons for Disposal

Sent Date: 10/21/2020 8:06:10 PM

Received Date: 10/21/2020 8:06:13 PM

From: Joni Arends

Created By: jarends@nuclearactive.org

Recipients:

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Files	Size	Date & Time
MESSAGE	3108	10/21/2020 8:06:13 PM

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Priority: Standard

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