

SUNSI Review Complete  
 Template = ADM-013  
 E-RIDS=ADM-03  
 ADD: Marlayna Doell

<p><b>As of:</b> 11/5/20 9:55 AM  <b>Received:</b> September 08, 2020  <b>Status:</b> Pending_Post  <b>Tracking No.</b> 1k4-9iuh-wcwm  <b>Comments Due:</b> October 21, 2020  <b>Submission Type:</b> Web</p>
---

# PUBLIC SUBMISSION

COMMENT (889)  
 PUBLICATION DATE:  
 3/6/2020  
 CITATION 85 FR 13076

**Docket:** NRC-2020-0065

Transfer of Very Low-Level Waste to Exempt Persons for Disposal

**Comment On:** NRC-2020-0065-0001

Transfer of Very Low-Level Waste to Exempt Persons for Disposal

**Document:** NRC-2020-0065-DRAFT-0893

Comment on FR Doc # 2020-04506

## Submitter Information

**Name:** Mary Ames

## General Comment

I strongly oppose the Very Low Level Waste (VLLW) plan to loosen NRC rules in order to permit nuclear waste to be dumped at sites without a nuclear license. No facility should be able to handle nuclear materials without a license. The NRC and agencies that preceded it made that promise to the American people -- and you must stay true to that promise.

Besides, the waste at issue is not all "very low level." Entire nuclear power reactors -- parts of them with quite a high level of radioactivity -- become waste after decommissioning. Under your plan, this higher level waste could get dumped in local land fills as regular trash or even be recycled into products that people will come into contact with every day.

The proposed "reinterpretation" of NRC regulations is a clear effort to let nuclear power owners shift legal and financial responsibility to the public.

Nor is it a safe option to send this material to hazardous or industrial waste sites. There, its radioactivity may react with other chemicals, increasing the likelihood of leaks to the outside air and water and increasing the toxicity of those leaks by orders of magnitude.

This VLLW proposal, by exemption, could permit entire nuclear reactors to be dumped or left in place as if they were not radioactive. That's outrageous and in complete violation of the NRC's mission.

Further, there is no process in the plan by which the public would know which landfills and which states are accepting nuclear waste. The whole proposal is a secretive, lacking provisions for public notice or opportunity for individuals or communities to intervene when their landfill or other facility is applying or approved as

"specific exempt." Once approved, a facility may accept this waste forever, handling it without clear restrictions or the threat of effective enforcement should the facility fail to operate safely.

And who would determine what amount of radioactivity is permitted? The NRC in whom the public has put its trust? NO. The applicant would determine that under this plan. For the proposed "dose limit" is a calculation that the applicant performs using unverified assumptions to claim the site will be acceptable. That is a blank check, allowing the applicant to remove unlimited amounts of nuclear waste from NRC control with no way to assure public safety.

This proposal is even more bold and expansive than the many previous efforts of the nuclear industry to dodge regulations -- efforts that the Congress and the public have resoundingly rejected for decades.

All radioactive waste, regardless of what innocent name it is given, is harmful to people and other living things. I therefore urge you to keep this material under regulatory control and not allow it to be released into the environment.

Thank you,