PUBLIC SUBMISSION

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

COMMENT (1550)
PUBLICATION DATE: 3/6/2020
CITATION 85 FR 13076

As of: 1/14/21 9:12 AM
Received: September 08, 2020
Status: Pending_Post
Tracking No. 1k4-9iur-dfay
Comments Due: October 21, 2020
Submission Type: Web

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-1554
Comment on FR Doc # 2020-04506

Submitter Information

Name: Victor Nepomnyashchy

General Comment

I oppose the VLLW plan to reinterpret the rules to let nuclear waste go to places without a nuclear license. Entire nuclear power reactors become waste and could get dumped as regular trash or even recycled into things I come into contact with every day.

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

I oppose this pseudo-rule change that would let nuclear waste in my or other communities' local landfill or other properties.

Sending it to hazardous or industrial waste sites is even worse because the radioactivity can react with other chemicals, making leaks to air and water exponentially more harmful than they are already. I oppose the exemption from nuclear regulatory control that could lead to the nuclear waste getting burned or recycled into everyday items and building supplies.

This VLLW proposal could permit, by exemption, entire massive nuclear reactors being dumped or left as if not radioactive.

NRC is claiming this reinterpretation is "voluntary." How will we ever know which landfills and which states are doing it? The whole proposal is a secretive deregulation without 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, it would be forever allowed to take that kind of nuclear waste with no enforcement of the very vague assumptions.

The proposed "dose limit"--really ANY dose limit--is a calculation done by applicant using unverified assumptions to claim the site will be acceptable. It is nothing but a blank check to allow unlimited amounts of nuclear waste out of regulatory control with no need to check or enforce radioactive leakage.

This proposal is even more bold and expansive than the many past efforts by the nuclear industry and its "regulators" which Congress revoked in the 1992 and the public has repeatedly rejected over the decades of the nuclear age.

Scrap this "interpretive" rule change. Keep nuclear waste under nuclear regulatory control and make the polluters pay to try to isolate it--not release it!

Thank you,