

From: Ned Flaherty <Ned_Flaherty@msn.com>
Sent: Tuesday, June 30, 2020 10:52 AM
To: VLLWTransferComments Resource
Subject: [External_Sender] No Radioactive Waste In Our Landfills

Nuclear Regulatory Commission (VLLW)

RE: No Radioactive Waste In Our Landfills

Dear ,

To NRC Commissioners, Staff, and VLLW Docket NRC-2020-0065

The VLLW reinterpretation of NRC guidance and nuclear waste management/disposal rules threaten my health and safety:

They would allow entire nuclear reactors to be dumped as if not radioactive.

1) Threat of exposure to manmade radioactivity

Some very long lasting nuclear power-generated materials, including radioactive plutonium, cesium, and iodine, would escape regulatory control. Waste that is now licensed would go to unlicensed "specific exempt" places, including:

- (a) my local solid waste / industrial landfills, where leaks threaten water, air, and workers;
- (b) hazardous waste sites, mixing radioactive with toxic, explosive wastes (without analyzing multiple, additive, cumulative, or synergistic effects);
- (c) recycling facilities that make household items, building supplies, and other products with which I have regular daily contact and potential exposure;
- (d) incinerators --- Burning SPREADS radioactivity instead of destroying it. Low, slow, inhalation is one of the most harmful ways to be exposed to radioactivity.

2) Threat to democracy and rights of states to provide greater protection than NRC

- (a) Communities would not be notified when facilities apply for or are approved as "specific exempt";
- (b) there is no opportunity for individuals or local governments to comment on or stop the NRC's granting of the "specific exemption";
- (c) there is no verification of what goes to exempted waste sites;
- (d) there is no enforcement of what goes to exempted waste sites.

Keep radioactive waste under control --- Do NOT send it to regular or hazardous waste sites.

Rescind the VLLW proposal and continue requiring all handlers of nuclear waste to have a specific radioactive license, not "specific exemptions."

The VLLW plan is really Very Large Lies about nuclear Waste --- it threatens worker and public health and environment and is a direct taxpayer-funded subsidy to nuclear power profiteers. It shifts liability from nuclear waste makers and dumpers to the public and workers.

Entire nuclear power reactors --- buildings, concrete, soil, metal components, pipes, etc. --- become radioactive waste during nuclear power production. Massive amounts of nuclear waste and radioactivity would be released --- as if not radioactive --- to untrained, unlicensed places.

To become "specific exempt," the landfill operator or nuclear waste-maker answers only 5 short questions for permanent exemption, and is never required to keep records, report, monitor, or to limit the amount of nuclear waste.

VLLW is not just "slightly contaminated" waste --- it would allow ALL the waste (maybe even more) that now goes to licensed nuclear waste sites to go to regular garbage. The limit is high, and is not enforceable or verifiable. It allows doses of 25 millirems/year, which over a lifetime means 1 in 500 people will get cancer from the exposure. And there is no limit on the number of "specific exempt" sites or waste streams. There is no safe level.

The VLLW proposal threatens workers and members of the population, especially women and children. Workers at landfills, recycling centers, metal facilities, and transport would be exposed to the bulk of nuclear power decommissioning waste without knowledge, consent, or basic protection.

Communities won't know if their local landfills are taking nuclear waste because NRC requires no public notice.

No secrets --- If NRC proceeds, against public opposition, it must publicly announce which facilities are applying to take nuclear waste, and it must provide meaningful opportunity for public input and intervention. and it must publish an Environmental Impact Statement.

This proposal is much worse than the similar Below Regulatory Control policies that Congress revoked.

Revoke the VLLW "interpretation."

NRC has not reported the estimated radioactivity that the new rules would release. The new rules are more than a mere reinterpretation; they are a major reversal of policy and a major federal action requiring Environmental Impact Statements, both Programmatic and site specific for each landfill or other place that would take the waste.

Do not authorize any person, landfill or facility as "Specific Exempt" as proposed in this VLLW reinterpretation of NRC rules.

Redirect NRC resources to better isolation, not release of radioactive wastes.

Stop all efforts to let nuclear power waste go to our landfills, incinerators (which never destroy radioactivity), recycling streams for consumer goods, or any other un-licensed places.

NRC claims that it "intends" for waste to go only to landfills but this "reinterpretation" opens the floodgates to radioactive zippers, frying pans, and baby toys which the public has rejected dozens of times over decades.

Sincerely,
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