

From: Kate Harris <kate@earthlovers.org>
Sent: Tuesday, June 30, 2020 1:09 PM
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 the NRC Commissioners, Staff and VLLW Docket NRC-2020-0065

The VLLW reinterpretation of NRC guidance and rules for managing and disposing of nuclear waste poses threats to life in many unacceptable ways.

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

1) Threat of exposure to man-made radioactivity

Some very long lasting nuclear power-generated materials, including radioactive plutonium, cesium and iodine, would be deliberately let out of regulatory control. Waste that is now required to be kept at a radioactively licensed facility would go to unlicensed "specific exempt" places including

- (a) solid waste and industrial landfills, which are leaking or will eventually leak, threatening water, air and workers
- (b) hazardous waste sites, mixing radioactive with toxic, explosive wastes (with no analysis of multiple, additive, cumulative and synergistic effects)
- (c) recycling facilities that make household items, building supplies, and other materials risking potential exposure (Though not "intended" by NRC, it's not prohibited.)
- (d) incinerators--Burning spreads radioactivity and does NOT destroy radioactive elements. Inhalation is one of the worst exposure pathways for radioactivity--especially in the low, slow, continuous doses which could result.

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

- (a) there is no requirement for notification of communities that a landfill or other facility is applying or approved as "specific exempt"
- (b) there is no opportunity for individuals or local governments to give input or stop the NRC granting of the "specific exempt"

(c) there is no verification of what goes to exempted waste sites or facilities and no enforcement.

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 threatens worker and public health and our environment and is a direct subsidy to the nuclear energy industry and the entire nuclear energy and weapons fuel chain. It shifts liability from nuclear waste creators and disposers to the public and workers.

Entire nuclear energy reactors-buildings, concrete, soil, metal components, pipes and more become radioactive waste during nuclear energy production. Massive amounts of nuclear waste and radioactivity would be released as if it were not radioactive to places which lack proper training or licensing to handle it. To become "specific exempt," the landfill operator or nuclear waste-creator answers five short questions for permanent exemption--with no requirements to maintain records, report, or monitor and no limit on the amount of nuclear waste it brings in.

VLLW is not just "slightly contaminated" waste--it would allow ALL the waste (perhaps even more) that now goes to licensed nuclear waste sites to go to regular garbage sites. The allowable level is high and 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 so the risk is likely even higher. There is no safe level, plus this is in addition to 'background' (which has increased over time due to human releases from bomb testing and nuclear reactor emissions into air and water, so is far from natural).

The VLLW proposal threatens workers and other members of the population (women and children disproportionately). Workers at landfills, recycling centers, metal facilities and in 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 the NRC does not require public notice.

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

This proposal is much worse than the similar Below Regulatory Control policies which Congress revoked. Revoke the VLLW "interpretation."

The NRC has not reported an estimate of the amount of radioactivity this proposed "reinterpretation" of its rules would release. This is more than a reinterpretation--It is a major reversal of policy and a major federal action requiring Environmental Impact Statements--both programmatic and site specific for each landfill or other location that would accept this waste.

Do not authorize any person, landfill or facility as "Specific Exempt" as proposed in this VLLW reinterpretation of the NRC rules. Redirect the NRC resources to better isolation, not the release of radioactive wastes.

Stop all efforts to let nuclear energy waste be dumped in our landfills, burned in our incinerators (which do not destroy radioactivity), or enter recycling streams for consumer goods or any other locations which are not licensed for radioactive waste and materials. The NRC "intends" for waste to only go 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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