

From: Judy Lukasiewicz <jsteel@cruzio.com>
Sent: Tuesday, June 30, 2020 4:03 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

It has been made clear over time, there is no safe method of storing nuclear waste over the span of its radioactivity. Since this is true, it turns out that the VLLW reinterpretation of NRC guidance and rules for managing and disposing of nuclear waste are a threat to me and other US citizens in several outstanding ways:

They would potentially allow entire nuclear reactors to be dumped as if they were NOT extremely radioactive. This perspective is irresponsible and ignorant of proven facts:

1) Threat of exposure to manmade radioactivity

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

(a) Local solid waste and industrial landfills, which are leaking and/or will eventually leak, threatening water, air, workers and the general public.

(b) Hazardous waste sites, mixing radioactive with toxic, explosive wastes (with no analysis of multiple, additive, cumulative and synergistic effects).

(c) Recycling facilities to create household items, building supplies, other materials with which my family and community have regular daily contact and potential extremely harmful exposure (--Even though not "intended" by NRC, it's not prohibited.).

(d) Incinerators--Burning spreads harmful radioactivity--burning does NOT destroy radioactive elements. Inhalation is one of the most damaging and harmful ways to be exposed to radioactivity--especially in low, slow, continuous doses which would result.

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

(a) There is no requirement for notification of communities that a landfill or other facility is applying or approved as "specific exempt" for the dumping of hazardous nuclear waste.

- (b) There is no opportunity for individuals or local governments to give crucial input or to immediately stop the NRC granting of the "specific exempt" classification.
- (c) There is no verification of what goes to exempted waste sites or facilities and no enforcement.

All of this is completely unacceptable and dangerous to life. We must face the only viable solution and end nuclear power generation due to the absence of safety with regard to unavoidable radioactive waste.

The USA and NRC must keep any and all radioactive waste under control--Do NOT send it to regular or hazardous waste sites. Rescind and disallow the thoughtless VLLW proposal and continue requiring all handlers of nuclear waste to have a specific radioactive license, not "specific exemptions."

The VLLW plan is really attempting to put radioactive waste into US communities as a means of getting rid of an unsolvable radioactive waste problem. The VLLW is clearly equivalent to Very Large Lies about nuclear Waste--it threatens worker and public health and environment and is an attempt at providing a direct and undeserved subsidy to unsafe and inefficient nuclear power and the whole nuclear power and weapons fuel chain. The VLLW would illegally shift liability from nuclear waste promoter, makers and dumpers to the public and nuclear workers. This entire idea is unconscionable and unsound. The USA and its citizens do not want or need any irresponsible relapse to dangerous and unsafe nuclear power.

If taken seriously, the proposed VLLW would allow the disposal of entire nuclear power reactors--buildings, concrete, soil, metal components, pipes and more, which become highly radioactive waste during nuclear power production. Massive amounts of nuclear waste and radioactivity would then, potentially, be released as--if it were not radioactive--to places without training, safety, or licensing to handle any of it. To become "specific exempt," the landfill operator, or the nuclear waste-makers, would be asked to answer 5 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. --Not at all acceptable.

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

The ill-conceived VLLW proposal threatens workers, women and children in impoverished communities disproportionately. Workers at landfills, recycling centers, metal facilities and in transport would be exposed to the bulk of nuclear power decommissioning radioactive waste without knowledge, consent or basic protection. Our US communities wouldn't know if their local landfills are taking nuclear waste because, according to the proposal, NRC would have no requirement for public notice.

No secrets--If NRC ever proceeds with any disastrous proposal such as the VLLW, against enormous public opposition, it must publicly announce which facilities are applying to take nuclear waste and provide meaningful opportunity for public input and intervention as well as an Environmental Impact Statement. Nuclear waste is not safe under any circumstances, which is why this VLLW proposal must remain in the realm of illegal, as it is.

This proposal allows the US public to be exposed to private nuclear generation waste, which is, of course, not acceptable. just as are the similar Below Regulatory Control policies that Congress revoked. --Please also revoke the VLLW "interpretation."

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 place that would be proposed to take radioactive waste.

Do not authorize any person, landfill or facility as "Specific Exempt" as proposed in this VLLW reinterpretation of NRC rules. Instead, redirect NRC resources to better isolation, not intensified release of radioactive wastes onto the public. The public must be protected from radioactive waste at all costs to the manufactures of any and all nuclear waste.

Please stop all efforts to let nuclear power waste go to our landfills, incinerators (which enhances, and does not destroy radioactivity), recycling streams for consumer goods or any other places that 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 leaks into soil, water and air, as well as into recycling products for radioactive zippers, frying pans and baby toys which the public has rejected dozens of times over decades.

The solution remains to end nuclear waste generation. Period.

Thank you for working on resolving the issues created by nuclear power and weapons and their unresolvable, unsafe waste generation in the USA.

Sincerely,
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Federal Register Notice: 85FR13076
Comment Number: 2560

Mail Envelope Properties (1456846035.2454.1593547367253.JavaMail.tomcat)

Subject: [External_Sender] No Radioactive Waste In Our Landfills
Sent Date: 6/30/2020 4:02:47 PM
Received Date: 6/30/2020 4:02:49 PM
From: Judy Lukasiewicz

Created By: jsteel@cruzio.com

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Files	Size	Date & Time
MESSAGE	7571	6/30/2020 4:02:49 PM

Options
Priority: Standard
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