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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

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Comment on FR Doc # 2020-04506

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General Comment

See attached file(s)

Attachments

NRC.CommentLtr.VTDEC.20200922



AGENCY OF NATURAL RESOURCES

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September 22, 2020

Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

RE: Transfer of Very Low-Level Waste to Exempt Persons for Disposal– 85 FR 13076;
Docket ID NRC–2020–0065

Dear Sir/Madam:

The Vermont Department of Environmental Conservation (VT DEC) appreciates the opportunity to provide comments on the U.S. Nuclear Regulatory Commission's (NRC's) Proposed Interpretive Rule, Transfer of Very Low-Level Waste to Exempt Persons for Disposal NRC-2020-0065, published in the Federal Register on March 6, 2020 (85 FR 45).

The VT DEC agrees with and fully supports the comments made about the proposed interpretive rule by the Association of State and Territorial Solid Waste Management Officials (ASTSWMO), in its letter dated July 20, 2020 (copy attached). In addition, the VT DEC would like to reiterate the concern expressed by ASTSWMO that the NRC, should the rule become final, would be essentially transferring its responsibility for ensuring that exemption limitations are met to State solid and/or hazardous waste officials without assurance that those officials have the radiation health physics background necessary to make such determinations, an understanding of the process, or any means for recovering the costs incurred by assuming this responsibility.

The VT DEC looks forward to the NRC's consideration of these comments.

Sincerely,

Chuck Schwer, Director
Waste Management and Prevention Division

