

PUBLIC SUBMISSION

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

COMMENT (1819)
PUBLICATION DATE:
3/6/2020
CITATION 85 FR
13076

As of: 2/2/21 7:27 AM
Received: October 14, 2020
Status: Pending_Post
Tracking No. 1k4-9jil-sy96
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-1827

Comment on FR Doc # 2020-04506

Submitter Information

Name: Tana Silva

General Comment

As Duke Energy Florida and Accelerated Decommissioning Partners prepare to dispose of the Crystal River nuclear plant, the proposed "reinterpretation" of NRC regulations adds an urgent concern about irreversible harm from dumping "VLLW" demolition debris and related materials into local landfills as regular trash and even potentially recycled. Their toxicity will continue incalculably into the future, and their spread once released would be irretrievable. Nuclear waste just can't be deregulated.

The proposed change would let nuclear plant owners shift legal and financial responsibility to the public, which already has subsidized the nuclear power industry in direct and indirect ways, nationally and locally, over many decades.

Sending these materials to hazardous or industrial waste sites also presents a danger of chemical and radioactive interactions making leaks to air and water more harmful than they are already. An exemption from nuclear regulatory control could result in nuclear waste being 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 they were not radioactive. The public would not know which landfills held nuclear waste, without public notice or opportunities for communities to intervene when facilities apply or are approved as "specific exempt" to take nuclear waste.

The proposed "dose limit" would be calculated by applicants to claim that the site would be acceptable. Once approved, the site could accept unlimited amounts of nuclear waste out of regulatory control, without being checked for radioactive leakage.

This proposal exceeds even the many past efforts by the nuclear industry and its ostensible regulators that Congress and the public have rejected over the decades of the nuclear age.

I ask that you represent our local, state, and national best interests by rejecting and actively opposing this

"interpretive" rule change. Nuclear waste must remain under nuclear regulatory control, and the industry that has benefited at public expense needs to isolate the toxic demolition debris and related materials, not release them irretrievably into the environment.

Thanks and regards,