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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-1834

Comment on FR Doc # 2020-04506

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General Comment

See attached file(s)

Attachments

201020_nrc-2020-0065-0001_keep_nuclear_waste_out_of_our_landfills

Tuesday, October 20, 2020

Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Program Management, Announcements and Editing Staff

Subject: Do not dump radioactive waste into our landfills or any other places that are "exempt" from nuclear controls -- Transfer of Very Low-Level Waste to Exempt Persons for Disposal (Docket ID: NRC-2020-0065-0001)

Dear NRC Commissioners and Staff:

I strongly oppose the Nuclear Regulatory Commission's (NRC) proposed reinterpretation of the rules which would allow radioactive waste to go to persons and places without radioactive licenses (Docket NRC 2020-0065). Do not release radioactive waste to places without nuclear regulatory control. Do not give "specific exemptions" to entities to take radioactive waste, regardless of what other permits they might have for other kinds of waste.

*"It is horrifying that we have to fight our own government to save the environment."
-- Ansel Adams*

Keep nuclear waste out of our communities, our solid and hazardous waste landfills and incinerators, and our processing and recycling centers. Nuclear waste is dangerous no matter how the NRC classifies it. With improper disposal, radioactive waste can leak into local water and food supplies. If incinerated, it can be released into the air.

It's extremely disturbing that this "very low-level waste" or VLLW proposal could permit, by exemption, entire massive nuclear reactors being dumped or left as if they are not radioactive. I strongly object to sending nuclear waste to hazardous or industrial waste sites because those sites are not designed to isolate radioactive materials. Because the radioactivity can react with other chemicals, the combined health and environmental effects of both hazardous and radioactive materials could be exponentially worse than each on their own. I also strongly oppose the exemption from nuclear regulatory control that could lead to the nuclear waste getting burned or recycled into everyday items and building supplies.

I object to the illegal, immoral way the NRC is trying to effectuate this radical change in radioactive waste policy. The NRC is procedurally attempting to bypass normal rulemaking procedures of both the NRC and the Administrative Procedures Act; and in practical terms, proposing a change in policy that will make it difficult, or even impossible, for the public or state regulators to track radioactive waste. This so-called "very low-level waste" is really a very large lie about nuclear waste, as it could result in release of intensely radioactive waste despite NRC's claimed "intent." The proposal is clearly designed to circumvent over a dozen state laws requiring regulatory control over all levels of radioactive waste in their states.

The NRC is claiming this reinterpretation is “voluntary.” How will we ever know which landfills and which states are doing it? The whole proposal is a secretive deregulation without public notice or opportunity for individuals or communities to intervene when their landfill or other facility is applying or approved as “specific exempt.” Once approved, it would be forever allowed to take that kind of nuclear waste with no enforcement of the very vague assumptions.

Fortunately, for a few of us, some states will not allow the release of nuclear waste to regular trash, recycling, incinerators or hazardous facilities. But for the majority of the country, it will be virtually impossible to track what happens with potentially all of the nuclear power waste other than irradiated (spent) fuel. In fact, once NRC puts this interpretation in place, states could be able to virtually deregulate radioactive waste disposal as well, meaning that the concerned public must be ever-vigilant to every action of both federal and state regulators who could be releasing nuclear waste with no public notice.

The NRC is proposing to allow same amount of radioactive emissions from unregulated “specific exempt” sites as from operating nuclear power reactors and waste dumps. This is unacceptable and furthermore, no amount of “millirems” is acceptable because they are not verifiable, enforceable or necessary. Managing the waste from nuclear power must remain the responsibility, legally and financially, of the licensed entities that made that waste.

“The ultimate test of a moral society is the kind of world that it leaves to its children.”
-- Dietrich Bonhoeffer

I support the current interpretation of US nuclear regulations that require that licensed nuclear material and waste to be in the possession of persons who have licenses under the Atomic Energy Act to handle and dispose of nuclear waste. The proposed “reinterpretation” of NRC regulations is a clear effort to let nuclear power owners to shift legal and financial responsibility to the public. I strongly oppose this pseudo-rule change that would let nuclear waste in my or other communities’ local landfill or other properties. Reject the VLLW proposal and all others that would release nuclear waste from radioactive controls. Keep nuclear waste under lock and key and out of solid and hazardous waste sites, whether landfills, incinerators, or recycling.

“A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.”
-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA