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**Date:** 12/29/01 6:48PM  
**Subject:** NUREG-0586

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Comments on Draft Supplement 1 to NUREG-0586, Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities.

Although the alternatives proposed for decommissioning nuclear facilities all sound reasonable, the proposal in general has one major problem, which is the NRC's lack of credibility due to past errors and cover-ups.

The present openness is most welcome, and a nice change, but past history hangs over NRC like a dark cloud.

My direct experience is limited to having heard an eyewitness account of the decommissioning of Yankee Rowe. This person reported a whole list of unfortunate incidents that released contamination into the air and groundwater, contaminating workers on site who were not wearing protective clothing, and possibly contaminating people along the rail and truck routes where parts of the plant were being transported.

In addition, many reports of lost shipments of nuclear waste and materials, including fuel rods, in various parts of the country come to light, another hazard of transporting radioactive materials.

Wherever human beings are involved, there are bound to be errors and accidents. The human element cannot be removed, as we found out at Three Mile Island and Chernobyl.

Therefore, the safest alternative would be, first, to consider each reactor site individually rather than making a blanket policy to cover every site. Second, the lowest possibility of releasing contamination into the environment requires entombing radioactive structures, systems and components in a long-lived substance, maintaining and monitoring it, until the radioactive level is reduced to a safe level, which would take many years.

This method would be the most likely to reduce exposure to workers and the public, and would not require workers familiar with the original construction.

Any of the methods proposed would require long time maintenance and monitoring, but keeping it in its original location would mean that the community would be familiar with it, it would be visible, and the community would be likely to care about its monitoring. In fact, involving the community in the whole process could utilize their experience and encourage their help.

Allowing the licensee to choose the decommissioning method is not recommended, due to the usual pressures to cut costs despite the obvious dangers.

ALARA is not a sufficient basis for judging proper methods.

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Radio and Electronics  
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Template = ADM-013

E-RFDS = ADM-03  
Add - M. Masnik (MTH2)

Thank you for holding these meetings in four locations around the country, and for encouraging public participation.

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More comments, These from Action for a Clean Environment