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From: "Sara Barczak" <sara@cleanenergy.ws>
To: <dgeis@nrc.gov>
Date: 12/27/01 12:58PM
Subject: Draft Supplement 1 to NUREG-0586--Comments from Georgians for Clean Energy

Dear NRC Staff--

Please find Georgians for Clean Energy's final written comments on the Draft Supplement 1 to NUREG-0586, Final Generic Impact Statement on Decommissioning of Nuclear Facilities, attached along with our oral comments that were made at the public meeting held in Atlanta, GA on 12-12-01.

Please let me know if you have any difficulty accessing either document.

Sincerely,

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Chief of Rules and Directives Branch
Div. of Administrative Services
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U.S Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Public Comments for December 12, 2001 U.S. NRC Public Meeting in Atlanta, GA on the Draft
Supplement 1 to NUREG-0586, Final Generic Environmental Impact Statement on
Decommissioning of Nuclear Facilities

COMMENTS OF GEORGIANS FOR CLEAN ENERGY

My name is Sara Barczak and I am the Safe Energy Director for Georgians for Clean Energy in our Savannah field office. Georgians for Clean Energy is a non-profit conservation and energy consumer organization. We are a statewide organization with members throughout Georgia and have focused on energy and nuclear concerns for 18 years.

Public Participation Concerns

I would like to start by addressing the process and how it limits the ability for the public to effectively participate in this and other nuclear related issues that impact Georgia communities. The technical nature of the issues and an ongoing resistance by nuclear regulators to share accurate information about nuclear threats has always made it difficult for the public to be involved in decision making involving nuclear energy issues. But after the tragic events of September 11th this problem has escalated to a point where our organization believes it is highly irresponsible of our federal government to go forward with making crucial decisions that will affect generations and generations to come. The NRC's website was not available for a time and is currently severely scaled back, making public access to important background information very difficult or impossible.

I have spoken with representatives of the U.S. Nuclear Regulatory Commission (NRC) and they have echoed some of my concerns as they too have difficulty gaining information on nuclear industry activities. If people like myself, who have the ability to research these issues on a full-time basis, along with staff members of the regulatory agency are having a hard time, imagine the fate of a concerned citizen who has limited time to devote? Moreover, the NRC's public notice that went out on November 2nd, 2001 contained an inaccurate link to the to the Public Electronic Reading Room. For citizens concerned about issues at Plant Hatch in South Georgia, unless they

have a hard copy of the relicensing documents, it is difficult for them to look up concerns that would be relevant to today's meeting. Therefore, we feel it is important to both extend the public comment period until these documents can be made readily available. Also it is essential to provide more meeting locations to gather public comments. Four locations is not enough given that we have nuclear reactors that will eventually be decommissioned in many states and the public has had difficulty in even accessing the necessary background information.

Georgians for Clean Energy promotes the shutdown of our unsafe nuclear power plants here in Georgia and the phase out of nuclear power nation wide. We also advocate for sound, systematic policymaking regarding decommissioning. Since many nuclear contaminants are extremely long-lived and dangerous to humans and the environment, decommissioning measures need to be handled most carefully as our future generations, literally, will depend on how well the job is done today.

The notion presented by industry and others that decommissioning is inherently safe because the plant is no longer operating is a deceptive argument that confuses the public. Due to the nature of radiation, even after shutdown, parts of the plant remain highly contaminated and extremely radioactive. The nuclear waste, such as the spent fuel, produced by the plant during operation generates heat and emits radiation for thousands of years after the plant is shut down. Therefore, there is risk to the workers at the plant and to the local communities during decommissioning.

Security

As many things are being reviewed in light of September 11th, decommissioning of nuclear reactors should be no exception. The draft GEIS is grossly deficient in ensuring that security measures are taken to protect our homeland security from threats of sabotage at a nuclear plant. Georgians for Clean Energy requests that a thorough, amended review of necessary security measures be compiled by the NRC and added to this supplement. Again, this highlights the need for an extended comment period and careful analysis of this issue.

It is now abundantly clear that nuclear materials are desired by terrorist organizations. Not only are our operating nuclear power plants terrorist targets, but so too is the nuclear waste they generate. Since a decommissioned nuclear power plant would have a greatly reduced security force, the closed plant could provide an easier opportunity for terrorists to obtain nuclear materials. In the case of plants like Hatch that have outdoor storage of nuclear waste, the notion of a reduced security force is even more troubling.

Site-Specific Concerns

Georgians for Clean Energy does not believe that a generic environmental impact statement (EIS)

regarding decommissioning of nuclear facilities is a sufficient tool for evaluating impacts borne to specific environments from decommissioning a nuclear power plant. We disagree with the process of using the significance levels of SMALL, MODERATE, and LARGE for a variety of issues at a variety of locations to come up with a generic, one-word answer. The classifications are generic in form, hard to understand, and it is difficult to figure out how the NRC came to those characterizations.

We disagree with the NRC conclusion that most of the environmental issues they addressed are deemed as “generic and SMALL for all plants regardless of the activities and identified variables” [P.xv]. I would enjoy hearing the response to that statement from fishermen downstream of Plant Hatch on the Altamaha or Plant Vogtle on the Savannah.

At least two site-specific environmental issues were identified—threatened and endangered species and environmental justice—with only four other issues listed as “conditionally site-specific”. That is ludicrous. We request that licensees undergoing or planning decommissioning require a new environmental assessment. It is not acceptable to give the option of using “recent environmental assessments”. What is the definition of “recent”? For instance, data from the 1970s on several fish and seafood species was originally used in the EIS for Plant Hatch relicensing. Though newer data later emerged, there’s no safeguard that Plant Hatch won’t use studies from the 1970s or 2000 on the endangered species shortnose sturgeon when they begin decommissioning decades from now.

Additionally, each nuclear power plant has a different historical performance record that may have impacted the surrounding environment in ways that are unique to the facility. What makes it acceptable to ignore these operating histories when decommissioning? Furthermore, some nuclear plants, like Hatch, have overflowing volumes of nuclear waste that are now being stored outdoors which impacts the environment and could affect decommissioning. Likewise, there is no experience in decommissioning nuclear reactors that have operated beyond the original 40-year license period. Again, Plant Hatch may pose a unique example if the aging plant is relicensed. The degradation that will occur due to the constant bombardment of radiation could affect how the plant is dismantled and how high the radiation exposures will be for workers and could easily add new accident scenarios. Plant Hatch, for instance, has a cracked core shroud. How will that deficiency affect decommissioning? These factors, among others, must be incorporated in addressing the decommissioning of individual facilities.

Economic Concerns

Georgians for Clean Energy requests that all decommissioning costs should be borne by the parent company of the licensee in perpetuity. The parent company should not be allowed to recoup the costs of decommissioning from the ratepayer or federal government through the taxpayer. Ratepayers and taxpayers in Georgia have already had to pay far beyond their share of

promised "cheap" nuclear power that has brought one of the largest rate hikes ever in Georgia. Furthermore, private landowners whether residential or commercial, farms, federal, state, county, city, community properties or others should not be responsible for the costs of monitoring, containment, or clean-up.

Georgians for Clean Energy is also concerned about economic impacts to the local communities associated with decommissioning. Currently, according to NRC relicensing documents on Hatch, Appling County receives an unhealthy 68% of its tax revenue from Southern Nuclear. Provisions for environmental staff and maintenance staff should be established in perpetuity and all costs should be borne by the parent company of the licensee. The local community, state, or taxpayers should not have to shoulder these costs. In the case of Appling County, after they lost their tax base they would not even be able to afford proper monitoring. Again, it is apparent that communities are left dealing with tremendous problems and little or no resources to address them properly. Quite a reward for being loyal to the company.

Regarding economics, the NRC needs to pay attention to decommissioning costs proposed by Georgia nuclear utilities during rate cases and other proceedings so there is not a situation created where much needed monitoring and maintenance is ignored simply because there was no regulatory attention to the real cost of decommissioning.

Environmental Comments

We have several concerns with the Environmental Impact Section of the draft GEIS. Again, we feel that a site-specific analysis must be done for each individual nuclear plant. This includes the area of the site itself along with downstream and downwind regions and all areas within the ingestion radius of the facility. There are already elevated levels of some radioactive contaminants nearly 100 miles downstream of Plant Hatch and Plant Vogtle.

It is hard to believe that decommissioning activities will have a small impact on water quality or air quality. Construction and demolition sites across Georgia, most of which do not have nuclear contaminants, contribute to the degradation of our rivers and air. How can an enormous project such as decommissioning an entire nuclear plant, which will involve the handling of nuclear contaminated materials, have a SMALL impact? We request a copy of analysis that was done to make this determination. Additionally, a thorough analysis of groundwater impacts seems lacking. Given Georgia's current concern over the Floridan aquifer, it is again hard to believe that something fundamental to life, water, is being analyzed generically. Future generations will depend on the resources that we are polluting today.

We adamantly disagree with the possibility of "rubblization" as a method of decommissioning. Chopping up a plant and storing it on site not only sounds ridiculous but also is grossly negligent of the fact that there are facilities designed, built and licensed to handle radioactive materials.

Georgians for Clean Energy does not promote the idea of shipping nuclear waste to other people's backyards, but recognizes that although organizations critical of nuclear power often forewarned local communities of these potential dangers, plant owners never told communities near nuclear plants that they were also accepting a permanent nuclear waste dump. Rubblization is an egregious assault on the public participation process and a devious example of corporations casting aside those communities that supported them over the years.

Georgians for Clean Energy also opposes any efforts by the nuclear industry or licensee of a decommissioning nuclear plant to "recycle" radioactive materials for release into the marketplace. It is appalling that there may be an option for companies involved in a technology that can cause its own facilities to become radioactive, to financially benefit from selling the "hot" garbage to unsuspecting citizens in the form of daily household products.

Health & Safety Comments

The nuclear facility's land, even after decommissioning, must not be allowed to revert to public or private use even if the NRC believes that the radioactivity on the land is less than 25 millirems per year. Additionally, under no circumstances should future buildings, structures, etc. be built atop the former nuclear site. The draft GEIS mentions that tourism activities are planned for the Trojan nuclear plant in Oregon after decommissioning [P. J-7]. Under no circumstances should that be allowed at any of these sites—bringing tourists or school groups to nuclear plants, even the plants that are running today, is dangerous and unacceptable.

All dockets that dealt with the nuclear facility must be reviewed prior to decommissioning to ensure that all previous problems or concerns with the site are taken into account and are addressed properly and thoroughly in decommissioning plans.

Low-Income Population Impacts

As we have stated in earlier comments, adequate attention to issues surrounding economic justice and the long-term, negative economic implications of decommission plans in the community have not been thoroughly studied. Reactor sites are often contaminated to the extent that the location is made undesirable and unsafe for future economic development. And again, site-specific studies should be conducted. The economy of rural Georgia is much different from that of urban New York.

In conclusion, as we have stated earlier, the methods used to decommission a nuclear plant will affect not only the communities of today but also the livelihood of future generations. The nuclear industry is leaving humankind a legacy of devastation—epitomized by its long-lived and highly dangerous nuclear waste. They are unable to solve their waste problem and now, when faced with the eventual shutdown of their plants, are unwilling to take measures to ensure that

the public is protected. The NRC is charged to protect the quality of the human environment and we ask that they all can uphold that charge. The current draft GEIS is not protective and needs major improvement. We again stress the need for site-specific Environmental Impact Statements on decommissioning for nuclear power reactors. Our communities—from the people to the waterways—are unique and are entitled to nothing less. Thank you.

December 27, 2001
Sent via certified mail
Emailed to dgeis@nrc.gov

Chief of Rules and Directives Branch
Div. of Administrative Services
Mail Stop T 6 D 59
U.S Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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

COMMENTS OF GEORGIANS FOR CLEAN ENERGY

Georgians for Clean Energy is a non-profit, statewide membership organization that has been working in Georgia for 18 years to protect air and water resources by changing how energy is produced and consumed. We are based in Atlanta, Georgia and have a field office in Savannah.

These comments and questions serve as a supplement to our oral statement made at the public scoping meeting held in Atlanta, GA on December 12, 2001 (see attached).

Public Participation Concerns

Georgians for Clean Energy remains concerned about the ability for the public to effectively participate in this and other nuclear related issues that impact Georgia's communities. Due to the tragic events of September 11th the Nuclear Regulatory Agency's (NRC) website was not available for a time and is currently severely scaled back, making public access to important background information very difficult or impossible. NRC staff mentioned at the public meeting on 12/12/01 that a full, top-to-bottom review of security concerns would be conducted. Georgians for Clean Energy urges that this review be done prior to the issuance of the final generic impact statement for decommissioning (GEIS).

Given the difficulty in accessing thorough and accurate information, including potentially relevant material such as the relicensing documents on Plant Hatch in South Georgia, we feel it is important to both extend the public comment period until these documents can be made readily available and to provide more meeting locations to adequately gather public comments. Since

nuclear reactors will eventually be decommissioned in many states the public should be given more than just four locations nationwide to voice their concerns. Public meetings should also be held in communities neighboring currently existing nuclear power plants.

Georgians for Clean Energy promotes the shutdown of our unsafe nuclear power plants here in Georgia and the phase out of nuclear power nationwide. We also advocate for sound, systematic policymaking regarding decommissioning. We continue to oppose the NRC's method of handling nuclear industry issues "generically" and urge that site-specific environmental impact statements be conducted as each nuclear reactor approaches final shutdown.

Security

In light of September 11th it is now abundantly clear that nuclear materials are desired by terrorist organizations. Our nation's operating nuclear power plants represent terrorist targets, but so too does the nuclear waste they generate. Since a decommissioned nuclear power plant would have a greatly reduced security force, the closed plant could provide an easier opportunity for terrorists to obtain nuclear materials. In the case of plants like Hatch that have outdoor storage of nuclear waste, the notion of a reduced security force is even more troubling. Georgians for Clean Energy again stresses the need for a full evaluation of security measures to be assessed prior to issuing a final GEIS.

Site-Specific Concerns

Georgians for Clean Energy does not believe that a generic environmental impact statement (EIS) regarding decommissioning of nuclear facilities is a sufficient tool for evaluating impacts borne to specific environments from decommissioning a nuclear power plant. After the explanation by the NRC staff at the public meeting in Atlanta, we further disagree with the process of using the significance levels of SMALL, MODERATE, and LARGE for a variety of issues at a variety of locations to come up with a generic, one-word answer. The classifications are generic in form, hard to understand, and it is difficult to figure out how the NRC came to those characterizations even after NRC staff attempted to explain it at the public meeting in Atlanta. If the NRC unwisely chooses to continue using this classification system, Georgians for Clean Energy urges that, at a minimum, layman's terms be used to define the levels and the methods used to categorize the issues.

Georgians for Clean Energy requests that the NRC require licensees undergoing or planning decommissioning to submit a new environmental assessment. We do not find it acceptable to give licensees the option of using "recent environmental assessments."

Some nuclear plants, like Hatch, have overflowing volumes of nuclear waste that are now being stored outdoors which impacts the environment and could affect decommissioning. The NRC

has no experience in decommissioning nuclear reactors that have operated beyond the original 40-year license period. Nor does the NRC have any experience decommissioning nuclear power plants that used plutonium bomb fuel, also known as mixed-oxide fuel (MOX). Again, these factors, among others, must be incorporated in addressing the decommissioning of individual facilities.

Economic Concerns

Georgians for Clean Energy does not believe that the GEIS adequately addresses decommissioning costs. Though assurances were made at the public meeting in Atlanta that decommissioning funds are adequate, real-world examples have proved otherwise. For instance, in the current world of mega-mergers of electric utilities and sudden dissolution of energy giants such as Enron, there is little guarantee in place that companies will be able to pay for the full costs of decommissioning. Additionally, we are concerned that the method of decommissioning a nuclear power plant is determined more by the cost implications to the licensee than the overall ramifications of leaving a contaminated site for the local communities.

An Associated Press news article from December 5, 2001, "Japanese power company begins dismantling country's oldest nuclear reactor," highlighted the enormous financial and technical concerns that Japan is facing regarding decommissioning, "Japan Atomic Power Co., which took the Tokaimura plant off line in 1998, won't begin taking apart the reactor for another 10 years because extremely high levels of radiation remain inside, said spokesman Eichi Miyatani. It will completely dismantle the plant by 2017 and spend an estimated 92.7 billion yen (US\$748 million), Miyatani said." These monetary figures exceed those that were mentioned as average decommissioning cost estimates at the NRC's public meeting in Atlanta.

Furthermore, a report issued this December by the United States Government Accounting Office, "NRC's Assurances of Decommissioning Funding During Utility Restructuring Could Be Improved--GAO-02-48," brings to light many concerns about the lack of adequate funding available for decommissioning activities. The following statement by the GAO makes it apparent that the NRC needs to improve, "However, when new owners proposed to continue relying on periodic deposits to external sinking funds, NRC's reviews were not always rigorous enough to ensure that decommissioning funds would be adequate. Moreover, NRC did not always adequately verify the new owners' financial qualifications to safely own and operate the plants. Accordingly, GAO is making a recommendation to ensure a more consistent review process for license transfer requests." (P.4)

Georgians for Clean Energy requests that this extensive report be thoroughly reviewed by the NRC staff, be printed in its entirety as an appendix in the final GEIS as the report did not come out before the draft GEIS was issued, and that the recommendations by the GAO be studied and incorporated into the final GEIS. Additionally, the public participation process should be

extended to allow for proper review of this important report.

The GAO report also highlights several uncertainties relating to the costs of decommissioning:

“Varying cleanup standards and proposed new decommissioning methods introduce additional uncertainty about the costs of decommissioning nuclear power plants in the future. Plants decommissioned in compliance with NRC’s requirements may, under certain conditions, also have to meet, at higher cost, more stringent EPA or state standards. New decommissioning methods being considered by NRC, which involve leaving more radioactive waste on-site, could reduce short-term decommissioning costs yet increase costs over the longer term. Moreover, they would raise significant technical and policy issues concerning the disposal of low-level radioactive waste at plant sites instead of in regulated disposal facilities. Adding to cost uncertainty, NRC allows plant owners to wait until 2 years before their license is terminated—relatively late in the decommissioning process—to perform overall radiological assessments to determine whether any residual radiation anywhere at the site will need further clean-up in order to meet NRC’s site release standards. Accordingly, GAO is recommending that NRC reconcile its proposed decommissioning methods with existing waste disposal regulations and policies and require licensees to assess their plant sites for contamination earlier in the decommissioning process. (P.4-5)

Georgians for Clean Energy is also concerned about economic impacts to the local communities. The NRC needs to pay attention to decommissioning costs proposed by Georgia nuclear utilities during rate cases and other proceedings so there is not a situation created where much needed monitoring and maintenance is ignored simply because there was no regulatory attention to the real cost of decommissioning.

Environmental Comments

Georgians for Clean Energy firmly believes that a site-specific analysis must be done for each individual nuclear plant. This includes the area of the site itself along with downstream and downwind regions and all areas within the ingestion radius of the facility. As we mentioned at the public meeting in Atlanta, there are already elevated levels of some radioactive contaminants nearly 100 miles downstream of Georgia’s Plant Hatch and Plant Vogtle.

We are still concerned that the NRC mistakenly poses that decommissioning activities will have a small impact on water quality or air quality. Construction and demolition sites across Georgia, most of which do not have nuclear contaminants, contribute to the degradation of our rivers and air. Georgians for Clean Energy would like to know how the NRC determined that an enormous project such as decommissioning an entire nuclear plant, which will involve the handling of

nuclear contaminated materials, would have a SMALL impact on air and water quality. We have already requested a copy of the analysis that was done to make this determination, and since we have not received that analysis yet we continue to urge that the NRC make this available to the general public and us.

Additionally, a thorough analysis of groundwater impacts seems lacking. Given Georgia's current concern over the Floridan aquifer, we request that a site-specific assessment of groundwater quality be conducted prior to decommissioning. Also, we request that a more thorough analysis of groundwater issues be researched prior to issuing the final EIS. As an example, the NRC should request the most recent data from state agencies, such as the Georgia Environmental Protection Division, that are involved in negotiations regarding "water wars" between states—as in the ongoing dispute facing Georgia, Florida, and Alabama.

Georgians for Clean Energy requests that the "rubblization" method of decommissioning be removed from the final EIS. Chopping up a plant and storing it on site not only sounds ridiculous but also is grossly negligent of the fact that there are facilities designed, built and licensed to handle radioactive materials. A point supported by the GAO report cited earlier in these comments. Georgians for Clean Energy does not promote the idea of shipping nuclear waste all over the country and recognizes that nuclear plant owners and the NRC never told communities near nuclear plants that they were also accepting a permanent nuclear waste dump. Rubblization is an egregious assault on the public participation process and a devious example of corporations casting aside those communities that supported them over the years.

Georgians for Clean Energy also opposes any efforts by the nuclear industry or licensee of a decommissioning nuclear plant to "recycle" radioactive materials for release into the marketplace. No facilities should be able to sell their demolition debris. Instead, it should be dealt with as regulated nuclear waste since the bulk of the materials will be radioactively contaminated.

Health & Safety Comments

The nuclear facility's land, even after decommissioning, must not be allowed to revert to public or private use even if the NRC believes that the radioactivity on the land is less than 25 millirems per year. Additionally, under no circumstances should future buildings, structures, etc. be built atop the former nuclear site.

After the meeting in Atlanta, we are increasingly concerned about the safety of the workers that will be involved in decommissioning. Will a more specific analysis of worker effects be dealt with in the final EIS or is there a separate report that will research health impacts? Georgians for Clean Energy requests that all worker exposures that have occurred at nuclear power plants that are currently being decommissioned be made available to the public and listed in the final GEIS.

Low-Income Population Impacts

Reactor sites are often contaminated to the extent that the location is made undesirable and unsafe for future economic development. As we stated at the public meeting in Atlanta, Georgians for Clean Energy urges that site-specific studies be conducted. For example, the economy of rural Georgia is much different from that of urban New York. How can these impacts be treated generically? Some nuclear power plants are in urban settings where economic impacts could be much different than in rural areas that have little or no other major employer in the region.

Questions:

1. How will on-site, outdoor nuclear waste storage dumps, [also known as Independent Spent Fuel Storage Installations—ISFSI] like at Plant Hatch, be affected by decommissioning? How will the licensee of an ISFSI be impacted by events that may happen during decommissioning, i.e. what if there is an accident nearby and the casks are damaged or the site is rendered inaccessible?
2. How will the facility licensee, in our case, Southern Nuclear, benefit from later sale of the nuclear plant's land to a new owner? Also, how will the land be tracked after it's deemed "safe" and the licensee sells it...especially in cases where there may be a leak or a release of radiation into the environment after the initial sale occurred? For instance, isn't it in the best financial interest of the licensee, in our case Southern Nuclear, to use the fastest and least expensive decommissioning option so that the license can be terminated and they can sell the land before deficiencies can be found in the manner in which a plant was decommissioned?
3. How is the funding of decommissioning costs guaranteed to be met by a company in a day and age where gigantic utility companies can collapse at any moment, as has recently happened with Enron?
4. What legislation or regulations are in place to compensate communities, such as fisheries, farmers, etc. in cases of releases or accidents during or after decommissioning?
5. What agency or governing body is responsible for monitoring the site after the decommissioning is deemed "complete"? How do the licensee and a government agency, such as the NRC, which is mandated to protect the public health, allowed to walk away from a site that will essentially remain radioactive forever?

Conclusion

As we have stated earlier, the methods used to decommission a nuclear plant will affect not only the communities of today but also the livelihood of future generations. The nuclear industry is leaving humankind a legacy of devastation—epitomized by its long-lived and highly dangerous nuclear waste. They are unable to solve their waste problem and now, when faced with the eventual shutdown of their plants, are unwilling to take measures to ensure that the public is protected.

The NRC is charged to protect the quality of the human environment and we ask that they all can uphold that charge. The current draft GEIS is not protective and needs major improvement. We again stress the need for site-specific Environmental Impact Statements on decommissioning for nuclear power reactors. Our communities—from the people to the waterways—are unique and are entitled to nothing less.

Sincerely,

Sara Barczak
Safe Energy Director
Georgians for Clean Energy

Attachment

From: DGEIS
To: DaM2
Date: 1/7/02 7:30AM
Subject: Fwd: Draft Supplement 1 to NUREG-0586--Comments from Georgians for Clean Energy

Georgians for Clean Energy comments.