



# Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

January 15, 2002

L. Mark Padovan, Project Manager  
Division of Licensing Project Management,  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT: REQUESTED EXTENSION OF PUBLIC COMMENT PERIOD FOR  
"TENNESSEE VALLEY AUTHORITY; NOTICE OF CONSIDERATION OF  
ISSUANCE OF AMENDMENT TO FACILITY OPERATING LICENSE,  
PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION  
DETERMINATION, AND OPPORTUNITY FOR A HEARING"**

Dear Mr. Padovan:

The *Federal Register* on December 17, 2001, (Vol. 66, No. 242) noticed the above captioned opportunity for the public to comment on and submit intention to intervene in the proceeding related to the intention by the Tennessee Valley Authority to make tritium for atomic weapons at its Watts Bar nuclear power plant. This notice specified that the opportunity ended on January 16<sup>th</sup>.

The purpose of this letter is to request a 60-day extension to this public comment period for the following reasons:

1. The public comment period began one week prior to and included two major holidays (i.e., Christmas and New Years Day) during which the NRC's offices were closed to the public.
2. The NRC stopped providing docketed records to the Local Public Document Rooms (LPDRs) in or around November 1999 when the Agencywide Document Access Management Systems (ADAMS) went on-line. ADAMS was intended to provide access to docketed records posted after November 1999 and to provide a bibliographic index to docketed records prior to that date. Due to the vast implementation problems discovered by the NRC staff after ADAMS was foisted on the American public, it remains an unsuitable replacement for the former LPDRs.
3. The NRC pulled the plug on its website on or about October 10<sup>th</sup> and the majority of

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*E-RIS = ADM-03  
add = M. Padovan (LMP)  
B. Clayton (BRC2)*

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information formerly available via the internet remains not readily available to the public.

I have been contacted by two individuals who desire to respond to the pre-Christmas notice. The 60-day extension to the public comment period for this proceeding would enable these individuals to overcome the information-access burdens imposed on them, and other Americans, by the aforementioned NRC actions. Thus, UCS feels that the extension is warranted and should be granted by the NRC in this matter.

Sincerely,

David Lochbaum, Nuclear Safety Engineer  
Clean Energy Program  
Washington Office  
Union of Concerned Scientists