

From: <EdRussel@aol.com>
To: <dgeis@nrc.gov>
Date: 1/20/02 9:34PM
Subject: Decommissioning rule changes

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January 20, 2002

Chief, Rules and Directives Branch
Division of Administrative Services
Mailstop T 6 D 59
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Decommissioning Nuclear Power Reactors
Environmental Impact Statement Supplement 1

Dear Sirs:

I am a resident of, and practice law in, Plymouth MA. For years I have lived at peace with the neighboring Pilgrim nuclear plant. However, Sept 11 was an awakening for me and for many others in eastern Massachusetts.

I strongly object to the proposed changes to the decommissioning rules. We have recently become more sensitive to the rules governing nuclear power plants, even their decommissioning. Since these proposals were begun before September 11, I hope and expect that they will be dead on arrival at the Commission.

The only rules changes that I want to see until spent rods are removed to Yucca Mountain are to stricter rules.

Utility deregulation has put the ownership of these plants in hands that are not as responsible as they once were. Plymouth MA suffers financially because of the loss of tax revenue from the Pilgrim Plant - we cannot assume the additional risk these rules would place on us. Until the spent rods are removed from local nuclear power plants the decommissioning rules should be tightened, not loosened. Your proposal may have seemed reasonable earlier this year but we live in a very different world now. It can no longer be business as usual at the NRC.

Many key issues that local communities face as reactors close and owners leave (liability-free) will be unchallengeable, because they are being listed as "generic" issues. I support the designation of environmental justice and endangered species issues as site-specific (not generic) and designation of Rubblization as site-specific.

The proposed rules ignore radiation dangers after decommissioning. The NRC

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must incorporate offsite contamination in all evaluations of environmental impacts. The National Environmental Policy Act was written for a purpose, your proposed rules side step that purpose.

You must not remove license amendment requirements when changing from an operating license to a nuclear materials possession-only license. I stand firmly against the "release" of contaminated materials into daily consumer contact and commerce or unregulated disposal.

Deregulation has already had serious negative impact on local municipalities this will be just another blow.

Sincerely,

Edward T. Russell