

**From:** Margaret Nagel <formargaretn@earthlink.net>  
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**Date:** 1/24/02 1:51PM  
**Subject:** Weakening Requirements for Decommissioning US Nuclear PowerReactors

From:

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To:

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In setting requirements for decommissioning US nuclear power reactors, please bear in mind other things besides the needs of Richard (Enron) Cheney, Halliburton Inc., Brown & Root, and other powers that be. Long after these miserable "powers" have crumbled away, your children and grandchildren and mine, and their descendants, will have to live in this world. The nuclear power industry was a colossal mistake to begin with, as we all know. Most of us also realize that the immune systems of every living thing on this planet -- human systems included -- are becoming intolerably stressed by mounting (and synergistically interacting) levels of pollution of all sorts. To add to these levels by deliberately ignoring the dangers of radiation exposure is wantonly criminal. Those who do so will go down in history as villains of the worst sort: smug, obtuse, shrivel-hearted, deceiving, opportunistic, self-serving, cowardly, corrupt people who really ought to know better. I fail to see any moral difference between terrorists who fly planes into buildings, and bureaucrats who are perfectly willing to expose whole populations to additional dangers from radiation. In the name of humanity and morality, you should all leave your jobs now in righteous protest at what you're being asked to do. Walk out. Say goodbye. Go work at Wal-Mart if you have to. But don't recklessly endanger the health of this nation by acquiescing in these evil plans.

I utterly oppose:

1. "rubblization" with no opportunities for meaningful public intervention ahead of time.
2. allowing portions of sites to be released from regulatory control before the whole site is released.
3. ignoring radiation dangers after decommissioning is done and utility is relieved of liability.
4. ignoring radiation exposures to children and other vulnerable members of the population and creating a fictitious highest exposed "critical group" based on unsubstantiated assumptions.

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5. ignoring offsite radiation and permitting utilities to ignore it in decommission planning. NRC should incorporate offsite contamination into all evaluations of environmental impacts.

I also utterly oppose:

1. Preventing the National Environmental Policy Act from applying to most of the decommissioning process.

2. Making most aspects of decommissioning "generic" rather than site-specific, so they cannot be legally reviewed or challenged at individual sites.

3. Redefining terms to avoid local, site-specific opportunity to question, challenge, and prevent unsafe decommissioning decisions.

4. setting "low, medium, and high" environmental impact categories for each of the steps in decommissioning, to give the appearance that some things have negligible effects that don't warrant further consideration.

5. removing the requirement for a license amendment when changing from a nuclear power operating license to a nuclear materials possession-only license, thereby eliminating the opportunity for public challenge or adjudicatory processes.

6. attempting to legally justify the removal of the existing opportunities for community involvement and for legal public intervention until activities such as flushing, cutting, hauling and possibly rubblizing of the reactor are complete -- in other words, until the damage has irretrievably been done.

7. stating that 10 CFR 20 section E and its Environmental Impact Statement, NUREG 1496, are not part of the scope of this Supplement.

8. defining decommissioning, in part, to include the "release of property for unrestricted use" and the "release of property under restricted conditions" -- in other words, releasing radioactively contaminated materials into daily consumer use and commerce and unregulated disposal. How can you contemplate such a thing!!!!!!!!!!!!!!

Sincerely,

Margaret Nagel

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