

From: Donald Miller <d.w.miller@csuohio.edu>
To: <dgeis@nrc.gov>
Date: 1/25/02 5:56PM
Subject: NRC's supplement to NUREG-0586, re decommissioning

11/9/01

66 FR 56721

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I have some questions.

Why, in this same democracy that we hold up so proudly to the world, does the NRC seek to prevent public comment on the basic issue of public health in a nuclear world?

If the NRC is confident--as its supplementary changes to NUREG-0586 suggest-- that onsite and offsite radioactive contamination during decommissioning and afterward will be minimal, why does it seek to remove all liability from the owner even before the process is complete? (If the NRC is wrong, who will pay?)

It is my understanding that the purpose, and certainly the effect, of the proposed supplement to NUREG-0586 is to reclassify many decommissioning issues as "generic" in order to avoid a community's right of challenge and to allow owners to depart without liability. I understand that the NRC supplement seriously limits a community's ability to challenge even those issues that are considered "site-specific".

The designation of environmental justice issues and endangered species issues must remain viable SITE-SPECIFIC matters for public debate and legal challenge, as must the hazardous technology (I think of the continuing, poisonous twin-towers fallout) of rubblization.

The NRC must retain regulatory control of the entire site. The NRC must require a LICENSE AMENDMENT when an owner is granted a change from an operating license to a materials-possession-only license.

The owner must remain fully liable.

The NRC must address the subject of radiation dangers after decommissioning HONESTLY, USING THE BEST INDEPENDENT RESEARCH, including:

- exposure of children
- exposure of the weak, the ill, the elderly
- offsite contamination
- credible, not arbitrary, environmental impact categories

FOR EACH STEP OF A DECOMMISSIONING.

The NRC must NOT permit "release of property for unrestricted use" or under "restricted conditions". To permit the release of radioactively contaminated materials into daily consumer use and commerce, or to allow unregulated disposal of such materials is abhorrent. Bin Laden might approve of such an interesting experiment; I trust that the NRC does not and will not.

The NRC must resist the pressure of the nuclear industry. If their profits are waning, they have had their turn. The citizens of the U.S., who pay everyone's way, have a right to expect a healthy environment, and a right to fight for it within the U.S. legal system. (But what a shame that a fight is ever needed.)

Sincerely yours,

Template = ADM - 013

E-RIDS = ADM - 03
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REC'D
 2002 JAN 29 AM 11:54
 Rules and Directives
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 (10/1/01)

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