

**From:** "Mary S. Reed" <maryreed@localnet.com>  
**To:** <dgeis@nrc.gov>  
**Date:** 1/29/02 5:44PM  
**Subject:** NUREF-0586 Comments

11/9/01  
66 FR 56721  
43

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

I am opposed to the following changes to NUREF-0586:

In Supplement 1 to the Generic Environmental Impact Statement on  
Decommissioning:

NRC allows "rubblization" (crumbling the concrete reactor building) of  
nuclear reactors, without opportunity for public intervention until the  
action is completed.

NRC allows portions of sites to be "released" from regulatory control  
before the whole site is released.

NRC opens up two "entombment" options.

NRC ignores radiation dangers after decommissioning is done and utility  
is relieved of liability.

NRC ignores radiation exposures to children and other vulnerable members  
of the population and creates a fictitious highest exposed "critical  
group" based on unsubstantiated assumptions.

NRC ignores radiation offsite and permits utilities to ignore it in  
decommissioning planning. NIRS calls on the NRC to incorporate offsite  
contamination into all evaluations of environmental impacts.

NRC prevents the National Environmental Policy Act from applying to most  
of the decommissioning process. (The claim appears to be that this  
proposed Supplement 1 satisfies the Environmental Policy Act for most of  
the decommissioning issues.)

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

NRC redefines terms to avoid local, site specific opportunity to  
question, challenge and prevent unsafe decommissioning decisions.

NRC sets arbitrary and unsubstantiated (low, medium and high)  
environmental impact categories for each of the steps in  
decommissioning, to give the appearance that they have minimal effects,  
to justify not fully addressing them now and to prevent their inclusion  
in site-specific analysis.

NRC is removing the requirement for a license amendment when changing  
from a nuclear power operating license to a nuclear materials  
possession-only license. (With no license amendment, there is no

RECEIVED  
JAN 30 11:10  
Rules and Directives  
Branch  
NRC

Template = ADM-013

E-RIDS = ADM-03  
add = M. Masnik (NTM2)

opportunity for public challenge or adjudicatory processes.)

NRC is attempting, with this supplement, to legally justify the removal of the existing opportunities for community involvement and for legal public intervention until after the bulk of the decommissioning has been completed. This includes such activities as flushing, cutting, hauling and possibly rubblizing of the reactor.

NRC states that the portion of the decommissioning regulations (10 CFR 20 section E and its Environmental Impact Statement, NUREG 1496) that set the 25, 100 and 500 millirems per year allowable public dose levels from closed, decommissioned nuclear power sites, are not part of the scope of this Supplement

NRC defines decommissioning, in part, to include the "release of property for unrestricted use.." and the "release of property under restricted conditions."

If the changes pass, 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. "Generic" decommissioning issues are ones that NRC determines apply to numerous reactors and which are supposedly being resolved with this Supplement to the Generic Environmental Impact Statement. "Site specific" issues are ones that can still be raised in local communities, but the opportunities to address even site-specific issues is being curtailed dramatically. I support the designation of environmental justice and endangered species issues as site-specific (not generic). I oppose Rubblization but supports its designation as site-specific.

Please consider my opposition to many of the proposed Supplements. The public should not be further shut out of the decommissioning process. Nuclear waste is deadly and it's handling should not be downgraded in any way.

Sincerely,  
Mary S. Reed  
29 Sunnyside Road  
Scotia, NY 12302

**CC:** "Senator Charles Schumer" <senator@schumer.senate.gov>, "Senator Hillary Clinton" <senator@clinton.senate.gov>, "Rep. Mike McNulty" <mike.mculty@mail.house.gov>