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Chief, Rules and Directives Branch
Division of Administrative Services
Mail Stop T-6-D59
US Nuclear Regulatory Commission
Washington, DC 20555-0001

6/3/03

68FR 33209

(23)

Dear Sir:

I understand that you have solicited input from the public on your update of the NRC's "Generic Environment Impact Statement for License Renewal of Nuclear Plants." I live within 10 miles of Vermont Yankee in Vernon, Vermont, a 31 year old nuclear reactor, and thus have many concerns about license renewal. I have listed some of my concerns below.

In this post 9/11 era, the NRC needs to take seriously the possibility of a terrorist attack on a nuclear plant and needs to require a study of the environmental impacts of a terrorist attack from land, sea or air when it is licensing or re-licensing a nuclear reactor.

The NRC has stripped citizens of any input into re-licensing hearings. In contrast, when nuclear plants were first being constructed, citizens and scientists outside the industry provided an important safety net by questioning the science of the utilities and the NRC scientists. Citizen input needs to be restored to re-licensing hearings.

The GEIS should take seriously the effects of age degradation of components of nuclear plants and not rely upon the past reliability of plants. As these plants age, more and more unexpected failures are occurring, like the near-accident at Davis Besse. Scientists cannot accurately predict when such failures will occur as they have never dealt with plants this old before.

The GEIS should evaluate the potential accident **consequences** and not just risk probabilities. Consequences are potentially so catastrophic to the communities surrounding these plants that they must be considered. For example, federal studies estimate that a core melt at ENVY would cause 7,000 peak fatalities within the first year in a 15 mile radius and 17,000 peak cancer fatalities. A spent fuel pool fire could be equally disastrous.

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Add - B. Zakeman (BXZ)

No plants should be re-licensed until there is a permanent solution to the storage of radioactive waste that is up and running. Yucca Mountain, if it is ever built, will not be operating for many years.

Re-licensing should not be permitted until nuclear plants are required to store their spent fuel in a low-density configuration (to reduce the potential for a spent fuel pool fire) and there are strict standards for hardened dry cask storage that will require these casks to be able to resist a determined terrorist attack.

I hope that the NRC will address many of these concerns in the future as many people have lost faith in the NRC's willingness to make the public's health and safety as the priority in issues related to nuclear power.

Sincerely,

A handwritten signature in cursive script, appearing to read "Judy Davidson".

Judy Davidson