

3/5/2014

79FR 10531

**PUBLIC SUBMISSION**

As of: April 07, 2014  
 Received: April 04, 2014  
 Status: Pending\_Post  
 Tracking No. 1jy-8bcr-1ka0  
 Comments Due: April 04, 2014  
 Submission Type: Web

**Docket:** NRC-2013-0230  
 Fiscal Year 2014-2018 Strategic Plan

**Comment On:** NRC-2013-0230-0001  
 Draft Fiscal Years 2014-2018 Strategic Plan

**Document:** NRC-2013-0230-DRAFT-0075  
 Comment on FR Doc # 2014-04830



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2014 APR -7 AM 11:30

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USNRC**Submitter Information**

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**General Comment**

Subject: Docket ID NRC-2013-0230, Comments on the NRC's FY 2014-2018 Strategic Plan

The NRC conducts environmental reviews (Plan 1.1-3) to ensure that actions comply with the National Environmental Policy Act of 1969. Typically NEPA reviews are limited to site-specific environmental concerns, and do not provide global source life-cycle environmental impact evaluations. For major projects, like nuclear power generation, global source life-cycle environmental impact evaluations need to be included in the NRC Strategic Plan for the reasons that are discussed below.

Protecting the environment is a global event. The potential for Climate Change is also a global event. When you turn on a light switch you use energy and its "clean" – no emissions. You then look at the power source and let's assume it's also "clean". If you now stop looking, why didn't you stop when you received no emissions when you first turned on the light bulb? If the power source was nuclear power with parts manufactured all over the world (with emissions), then turning on the light was a global environmental event. Claiming an energy source provides "clean" energy based solely on the site where the electrical power is generated is misleading. It doesn't matter when in the life-cycle or where the generation occurs, what does matter is where the emissions occur and taking responsibility for those emissions.

A principled science based evaluation must look at the full global impact of any energy source to factually report its environmental effectiveness. Both NEPA and global source life-cycle environmental impact evaluations are necessary for a complete environmental understanding of any electrical generation power plant. A global source life-cycle environmental impact evaluation would identify the total emissions, including those from equipment manufacturing, construction, operation, fuel and through decommissioning. To normalize the emissions data the expected total power generated over the plant's licensed life would be determined based upon

SUNSI Review Complete  
 Template = ADM-013

ERFDS = ADM-03  
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proven past performance of similar designs. The most environmentally acceptable energy source would then be the lowest number (emissions/kilowatt-hour) determined by total emissions divided by the expected total power generated.

In Summary, including the development and implementation of a global source life-cycle environmental impact evaluation tools in your Strategic Plan: FY 2014-2018 provides the following benefits:

- A principled science based tool for factually determining total global environmental impacts,
- Aligns cause and effect – measure total global emissions to determine global environmental impacts,
- A basis for comparing the environmental effectiveness for different types and sizes of power generating plants including specific site and network requirements,
- Promotes informed decision-making by federal and state agencies by making detailed information concerning complex project environmental impacts available to both agency leaders and the public,
- Determines a baseline and provides a basis for industry to manage nuclear plants global and life-cycle environmental impacts,
- Supports NRC Mission to protect the environment, and
- Supports NRC Vision as a trusted, independent, transparent, and effective nuclear regulator.

Thank you for the opportunity to comment on your Strategic Plan. Should you have any questions or need additional information, please contact me at your earliest convenience.

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