

RULES AND DIRECTIVES
BRANCH
USNRC

PUBLIC SUBMISSION

2015 JUL 22 AM 10:02

As of: 7/22/15 9:58 AM
Received: July 20, 2015
Status: Pending_Post
Tracking No. 1jz-8k3f-t0p9
Comments Due: July 20, 2015
Submission Type: Web

RECEIVED

Docket: NRC-2015-0071

Unified Agenda of Federal Regulatory and Deregulatory Actions

Comment On: NRC-2015-0071-0002

Unified Agenda of Federal Regulatory and Deregulatory Actions; Semiannual Regulatory Agenda

Document: NRC-2015-0071-DRAFT-0005

Comment on FR Doc # N/A

6/18/2015

8 FR 35170

Submitter Information

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General Comment

The Nuclear Energy Institute (NEI), a lobby group of nuclear utilities-industrialists, wants the NRC to get rid of CPR Factor B the part which deals with participation and transparency. You say you will listen to them, but do not specify which parts: The NRC actively seeks to improve its rulemaking process and reporting, and is currently engaged in a process improvement initiative that would implement most of NEI's suggestions related to rulemaking reporting. NEI commented on the process the NRC uses to prioritize its rulemaking activities. The NEI suggested that the NRC: (1) Use a risk-informed prioritization methodology; (2) consider eliminating CPR Factor B from its methodology; (Fed Reg. Unified Agenda: <http://www.regulations.gov/#!documentDetail;D=NRC-2015-0071-0002>)

For risk informed do you mean of your bureaucratic choices or for safety? "Risk-informed" is nuclear jargon for evading safety standards and for evading public safety.

Which parts of Factor B are you getting rid of at the demand of the NEI? NEI wants to eliminate it:

"1. Regulatory Effectiveness: The way the NRC conducts its regulatory activities to best achieve its goals and objectives.

2. Openness: The way the NRC conducts regulatory activities as openly as possible with meaningful stakeholder involvement.

... Regulatory Effectiveness Strategies:

1. Proactively identify, assess, understand, and resolve safety and security issues.

SONSI Review Complete
Template = ADM-013

FRDS = ADM-03
Call = C. Berney (exbc)

2. Regulate in a manner that manages known risks and threats effectively and efficiently, communicates requirements clearly, and ensures that regulations are applied consistently, are practical, and accommodate technology changes in a timely manner.
3. Integrate safety and security programs to identify and avoid unintended consequences.

Openness Strategies:

1. Transparency: Make clear information about the NRC's responsibilities and activities accessible to stakeholders.
2. Participation: Enhance interaction with the public and other stakeholders through use of social media and further enable opportunities for meaningful participation in, and mutual understanding of, the NRC regulatory processes.
3. Collaboration: Promote domestic and global nuclear safety and security by creating and taking advantage of opportunities to increase collaboration and share best practices with other Federal agencies; State, local, and Tribal governments; and the international regulatory community. "

Which of these, if any, will you throw out at the demand of the nuclear industry NEI?

You are doing too many important rulemakings at once. The NEI is a club for nuclear utilities and industries, with the President of Exelon, with its ancient "fleet" of reactors, at its head. NEI has many full-time staff to keep up. And, you choose to listen to them, rather than to the American people. Even before nuclear, the utilities worked against the American people. Now it's a deadly working against. The NRC has completed 8 rulemaking activities since publication of its last Agenda on December 22, 2014 (79 FR 76855). This issuance of the NRC's Agenda contains 35 active and 23 long-term rulemaking activities: 2 are Economically Significant; 10 represent Other Significant agency priorities; 53 are Substantive, Nonsignificant rulemaking activities; and 1 is an Administrative rulemaking activity. In addition, 3 rulemaking activities impact small entities. The NRC is requesting comment on its rulemaking activities as identified in this Agenda."

I object to your listening to the NEI or any other interested lobby group. I object to your apparent wish to undermine the little participation and openness, BS though it is. I think that it is even illegal to do so. It certainly goes against the international transparency convention which the US government signed. Just shut down the NRC and save the US budget 1 billion dollars. If anyone survives your crimes, you will be held for crimes against humanity and murder, even if you are 94 years old - like the old Nazis.