

PUBLIC SUBMISSION

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Docket: NRC-2018-0201

Elimination of Immediate Notification Requirements for Non-Emergency Events

Comment On: NRC-2018-0201-0002

Elimination of Immediate Notification Requirements for Non-Emergency Events

Document: NRC-2018-0201-DRAFT-0016

Comment on FR Doc # 2018-25273

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General Comment

In the Matter of a Proposed Rulemaking to Amend 10 CFR 50.72, Immediate notification requirements for operating nuclear power reactors

Environmental Review, Inc. has reviewed the proposed rulemaking and has the following comments:

1) The Nuclear Energy Institute, in its petition to amend 10 CFR 50.72 asserts that the non-emergency notifications are contrary to the best interests of the public. I disagree with this assertion because in section 3 of their petition, the Nuclear Energy Institute failed to discuss specific situations cited in 10 CFR 50.72(b)(2)(xi) related to health and safety of the public, or on-site personnel, or protection of the environment, on-site fatalities, or the release of radioactive materials; nor did they discuss specific situations cited in 10 CFR 50.72(b)(3)(xiii) regarding emergency assessment capabilities, off-site response capabilities; nor did they discuss 10 CFR 50.72(a)(1)(i) regarding situations involving notifications state and local officials. Obviously, public notifications of these situations are in the best interests of the

public and should continue.

2) There are three kinds of notifications required by 10 CFR 50.72 where there is no corresponding requirement in 10 CFR 50.73. Those involve 50.72(b)(3)(xii) and (b)(2)(xi) including the release of radioactive materials to the environment, transport of a radioactive-contaminated person and news release to a government agencies. Obviously these are important reporting requirements which should not be discontinued. It is important to note that the Nuclear Energy Institute in its petition failed to spell out that these situations included release of radioactive materials to the environment. Since there are currently no other reporting requirements for these situations under 10 CFR 50.73 for these situations, the reporting of these events should continue.

3) Other important notification requirements which should continue include: notification of plant shutdown, requirement to notify oif a deviation from authorized activities under license occurs, notification of degraded conditions (i.e. safety barriers), and system actuation (e.g. boiling water pressurized water reactors, emergency feedwater, containment spray, emergency electric systems, system isolation status. It is important that these notifications continue because the seriousness of some conditions may not be readily apparent it is important to document an unanalyzed condition.

4) Alternatives to stopping reporting requirements may be to extend the timeframes for reporting.

5) Please send responses to these comments to envreview@gmail.com.

Sincerely yours, Tom Price-Director, Environmental Review, Inc. 1792 Rogers Ave, San Jose, CA 95112 www.envreview.org