presented in Appendix G Appendix G uses units of collective dose equivalent; however, as also outlined in the appendix, the radiation protection standards are in units of annual individual dose. The Supplement should use consistent units and provide data on population densities for nuclear power plants.

Appendix G.2 (page G-19) provides the average public dose within a 50 miles radius of a facility The Supplement should clarify if facilities which fall outside this analysis (e g , have denser populations yielding more person-rem than indicated in the appendix) must complete a site-specific analysis.

CL-16/66 61. Page 4-31, Section 4.3.8.4. While the overall worker health impact is SMALL, Appendix G shows data from some decommissioning facilities where worker exposure is higher during decommissioning than during operations. The Supplement should clarify how these higher exposure levels compare with the radiation protection standards. Also, this section should clarify whether an analysis was done of the normal wastewater streams produced during decommissioning that are contaminated with radiation.

CL-16/67 62. Pages 4-30, 4-12 and xii. The Supplement should clarify the circumstances under which rubblization is permitted. It is EPA's understanding that, to date, rubblization has only been permitted after site decontamination. Does the term "rubblization" on page 4-30 refer to the treatment of concrete or structures that have not been decontaminated? Note that page xii indicates that the continued dismantlement of structures that have been radiologically decontaminated falls outside the scope of the Supplement.

Environmental Justice

CL-16/68 63. Page 4-57, Section 4.3.13.4, Lines 36-38. The environmental sections of some PSDARs submitted to date have not provided detailed information. The Supplement should elaborate on the "appropriate information" that licensees should provide relating to environmental justice in the environmental section of their PSDARs to enable NRC to obtain sufficient information on potential environmental justice issues at decommissioning facilities.

Cultural, Historical and Archeological Resources

CL-16/69 64. Page 4-58, Section 4.3.14. EPA appreciates that, on the whole, decommissioning is not likely to affect previously undisturbed archeological resources potentially located near the facilities, but is concerned about the potential loss of these facilities as a body of engineering work. The Supplement mentions that a few facilities may be eligible for listing on the National Register of Historic Places individually and that those facilities would then be the subject of mitigation based upon consultation with the SHPO. Eventually, however, a substantial number of facilities may be decommissioned. While the facilities themselves may not be fifty years old nor require physical in situ preservation, the processes and engineering they employed may merit inclusion in the Historic American Engineering Record (HAER) The HAER is designed to provide uniform documentation standards so future scholars can look back at our achievements and study them for a multitude of purposes. Rather than make this determination on a case-by-case basis, the NRC may want to consider working with the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers to achieve a programmatic agreement or other programmatic treatment for these facilities

Transportation

CL-16/70 65. Page 4-68, Section 4 3 17.1. This section should address regulations governing the transportation of hazardous and mixed wastes as well as of low level waste.

CL-16/71 66. Page 4-69, Section 4.3.17 2, Line 5. What is meant by "not large enough to destabilize the important attributes of the system?"

CL-16/72 67. Pages 4-72 to 4-73, Section 4.3.18. The discussion of irretrievable resources more properly belongs in a section that summarizes environmental consequences. The Supplement could benefit from having such a section as was done with the recently issued draft NMSS guidance document on NRC preparation of NEPA documents.

CL-16/73 68. Page 4-72, Section 4.3.18, Line 9. It seems inappropriate to include concrete as an irretrievable resource.

CL-16/74 69. Page 4-72, Section 4 3.18 1, Line 14. The Supplement states that there "are no regulations that deal specifically with the concept of irretrievable resources." It is unclear what is meant by this statement. The following statutory and regulatory provisions pertain to irreversible and irretrievable resources in the NEPA context:
-- NEPA § 102(2)(C)(v), 42 U S C. § 4332(2)(C)(v);
-- 40 C.F.R. § 1502.16 (CEQ regulations); and,
-- 10 C F.R. Part 51, Subpart A, Appendix A (NRC regulations).

11/9/01
66FR56721 (17)

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

1035 OUTER PARK DRIVE • SPRINGFIELD, ILLINOIS 62704
217-785-9900 • 217-782-6133 (TDD)

George H. Ryan
Governor

Thomas W. Ortciger
Director

RECEIVED
Rules and Directives Branch
USNRC
'02 JAN -3 AM 7:43

January 7, 2002

TO: USNRC

FROM: Gordon Appel
Deputy Director
Illinois Dept. of Nuclear Safety
217/524-4723

Response to Comments on NUREG-0586

We mailed the response on December 28, 2001. Due to the mail, we are faxing this letter to you.

PAGES... 4
(including transmittal sheet)

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

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STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

1035 OUTER PARK DRIVE • SPRINGFIELD, ILLINOIS 62704
217-785-9900 • 217-782-6133 (TDD)

George H. Ryan
Governor

Thomas W. Ortciger
Director

December 28, 2001

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

Dear Chief, Rules and Directives Branch:

The NRC published a Notice of Availability of the Draft Supplement 1 to the Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities (NUREG-0586) on November 9, 2001 and invited comments from interested parties. In addition, the NRC hosted a series of public meetings to solicit comments from the public. The Department of Nuclear Safety was represented at one of these meetings and would like to offer these additional comments on the Draft Supplement.

CL-17/1 As mentioned at the December 6, 2001 public meeting in Chicago, the scope of the Draft Supplement is inadequate in its evaluation of the long-term radiological exposure to the public for the reactor entombment decommissioning method. The scope of the radiological impact studies in the supplement appear to focus solely on the actual decommissioning process, not the resultant site conditions remaining after the decommissioning is completed. Specifically, section 4.3.8 Radiological on page 4-26 states:

> "The NRC considers radiological doses to workers and members of the public when evaluating the potential consequence of decommissioning activities. Radioactive materials are present in the reactor and support facilities after operations cease and the fuel has been removed from the reactor core. Exposure to these radioactive materials during decommissioning may have consequences for workers. Members of the public may also be exposed to radioactive materials that are released to the environment during the decommissioning process. All decommissioning activities were assessed to determine their potential for radiation exposures that may result in health effects to workers and the public. This section

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considers the impacts to workers and the public during decommission activities performed up to the time of the termination of the license. Any potential radiological impacts following license termination are not considered in this Supplement. Such impacts are covered by the *Generic Environmental Impact Statement in Support of Rulemaking on Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities*, NUREG-1496."

CL-17/2 For purposes of this GEIS, the NRC is only focussing on the environmental impact of the actual decommissioning activities between the cessation of operations and license termination. This approach completely and inappropriately ignores the environmental impact associated with any radioactive material remaining following license termination.

CL-17/3 For a site decommissioning that results in a license termination for unrestricted use, the long-term radiological impacts to the public may well be within acceptable limits. However, for a decommissioning that results in a license termination with restricted site use the potential exists for long-term radiological impacts to the public to be far above acceptable limits. The draft Supplement does not consider this potential. While narrowly focussing the radiological studies to the decommissioning process, the NRC does not consider those potential long-term impacts to the public.

When the original GEIS was issued in 1988, the NRC viewed entombment as an unlikely decommissioning method. The issue of entombment was not publicly discussed in the 1997 timeframe that NUREG-1496 was published. It is unlikely that NUREG-1496 addresses the long-term radiological impacts associated with entombment. In 1999, the NRC began to consider entombment as possible decommissioning options or methods and conducted a workshop in
CL-17/4 December 1999 to gain input from the public. On October 16, 2001, the NRC published an advance notice of proposed rulemaking regarding entombment options for power reactors. Even with that notice and this draft Supplement, the NRC has yet to evaluate the long-term environmental impacts associated with
CL-17/5 entombment of power reactors. In this Supplement, the NRC fails to consider whether it has the statutory or regulatory authority to terminate a license that allows for unrestricted site use with residual contamination present on site or to
CL-17/6 terminate the license with restricted site use in an Agreement State. Residual contamination left at a site whose license was terminated for unrestricted use could
CL-17/7 be perceived as disposal of low-level radioactive waste. By definition

entombment is disposal of low-level radioactive waste in the containment
CL-17/8 structure. The Atomic Energy Act allows states to assume regulatory authority over the disposal of low-level radioactive waste in their state. In an Agreement State it is the Agreement State not the NRC that has the jurisdiction over disposal of low-level radioactive waste at reactor sites.

The federal government has established policies regarding the disposal of low-level radioactive waste. The federal Low-Level Radioactive Waste Policy Act of 1980 and the Amendments Act of 1985 require the states to provide for the disposal of low-level radioactive waste generated within their borders. States were encouraged to form regional compacts to limit the number of disposal facilities developed. As an incentive to form compacts, compacts were given certain rights to control the import and export of low-level radioactive waste into or out of their region as well as to establish policies regarding the management of waste within their region. To date, 10 such compacts have been formed and ratified by Congress. Most compacts envision having one regional disposal facility that
CL-17/9 would accept and safely dispose of their region's waste. Allowing NRC to determine whether waste can or will remain after a reactor license is terminated is contrary to the policy of the respective compacts and in direct disregard of the federal low-level radioactive waste framework established by Congress.

CL-17/10 As the NRC evaluates the comments received on the GEIS, it should look beyond the actual decommissioning process and focus on what condition the site
CL-17/11 would be in following license termination. If the possibility exists that radioactive material will remain on site under an unrestricted or restricted use condition, the GEIS should consider the associated long-term environmental impacts. In
CL-17/12 addition, the NRC should reevaluated their legal standing in deciding what radioactive material would remain at a reactor site located in an Agreement State and whether their proposed action would be contrary to the waste management policies of the applicable compact.

Any question you may have regarding this letter may be directed to me at 217/785-9868.

Sincerely,

Thomas W. Ortciger
Director

TWO:bac

11/09/01
66FR56721
(18)

From: "Hickey, Eva E" <eva.hickey@pnl gov>
To: "mtm2@nrc.gov" <mtm2@nrc.gov>, "sxf@nrc gov" <sxf@nrc.gov>
Date: 1/15/02 6 25PM
Subject: FW: Comments on NUREG-0586 Draft Supplement 1

-----Original Message-----
From: Jerry Delezenski [mailto:JDeleze@smud org]
Sent: Tuesday, November 20, 2001 11:12 AM
To: 'dgeis@nrc.gov'
Subject: Comments on NUREG-0586 Draft Supplement 1

Cynthia Carpenter, Chief
Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission

Re: Comments on NUREG-0586 Draft Supplement 1

Ms. Carpenter:

CL-18/1 We would like to comment on the draft NUREG to correct an error in Table 4-3, line 21 regarding the Cost Impacts of Decommissioning for Rancho Seco. Line 21 should read:

Rancho Seco 913MWe PWR DECON $394

Please refer to our letter submitted to the NRC Document Control Desk dated 3/26/01 entitled Rancho Seco Report on Decommissioning Funding Status. On page 2 of the letter we stated:

"...Their [TLG] estimate was $495.4 million in 2000 dollars. The portion of this total that is non NRC-defined decommissioning activities related to non-radiological dismantlement and management and storage of spent fuel is $101 million, most of which is related to fuel storage costs..."

...TABLE 2...
2000 $495 Million.....

SMUD, when it first established its decommissioning fund, included radiological dismantlement costs and costs related to storing spent fuel. Therefore, $495m -$101m leaves $394 million for equivalent cost discussed in Table 4-3 of the NUREG.

CL-18/2 Since 1999, Rancho Seco has embarked on an extended DECON process scheduled for completion in 2008 (including license termination). After license termination, SMUD will, depending on its business needs, embark on sit restoration currently estimated at ~$45-80 million. This approximate estimate dollar figure was never a part of the decommissioning trust fund. (We assume your number in Table 4-3 includes all the costs of dismantlement, fuel storage and non-radiological site restoration.)

CL-18/3 Also, based on information presented in various industry forums, several

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Add = M. Masnik (MTM2)

numbers quoted for some of the other plants may be inaccurate. Each plant should verify the numbers for accuracy.

Thank You,

Respectfully,

Jerry Delezenski,
Supt. QA/Licensing/Admin
Rancho Seco

Stephen A Byrne
Senior Vice President, Nuclear Operations
803 345 4622

SCE&G
A SCANA COMPANY

December 20, 2001
RC-01-0204

11/7/01
66FR56721
(19)

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

Gentlemen:

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
COMMENTS ON THE DRAFT SUPPLEMENT TO THE FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT ON DECOMMISSIONING OF NUCLEAR FACILITIES

Reference: Draft Supplement 1 to NUREG-0586, "Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities" November 9, 2001, Federal Register, 66-FR-56721

South Carolina Electric & Gas (SCE&G) company offers the following comments on the above-mentioned document.

CL-19/1 Page 3-24 mentions the containment ceiling being lowered to the top of the pressurizer for a PWR under the ENTOMB2 option. Appendix E, page 9 lists this action as optional. This action needs to clearly be listed as optional on pages 3-24, 3-25, and 3-31. SCE&G believes this action should be optional as listed in Appendix E due to the extreme effort to lower the ceiling of a massive building such as the reactor building and yet maintain it intact for entombment purposes.

CL-19/2 Also, on page 3-24 "low density concrete grout" is mentioned. Grout is not lightweight, but concrete can make use of lightweight large aggregate to lower the weight per volume. Therefore, SCE&G recommends concrete be used in place of grout on pages 3-24, 3-25, 3-31, and 3-33.

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E-RIDS = ADM-03
Add = M. Masnik (MTM2)

If you have any questions, please call Chris Crowley of my staff at (803) 345-4409.

Very truly yours,

Stephen A. Byrne

CAC/SAB/mb

c: N. O. Lorick
N. S. Cams
T. G. Eppink
R. J. White
L. A. Reyes
R. R. Assa
NRC Resident Inspector
K. M. Sutton
W. R. Higgins
RTS (0-L-99-0290 #4)
File (811.10)
DMS (RC-01-0204)

NUCLEAR EXCELLENCE - A SUMMER TRADITION!

21 PAGES TOTAL · COPY

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

11/9/01
66FR56721
(20)

PAMELA BLOCKEY-O'BRIEN, D23 Golden Valley
7631 Dallas Hwy, Douglasville, GA 30134

Dec. 26th, 2001

RE: Comments for the record on "Draft Supplement 1 to Nureg-0586, Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities (GEIS), Draft Supplement Dealing with Nuclear Power Reactors".

What a way to spend the day after Christmas-what a way to spend many hours of December and November-having to plow through this document - a monument to mans' arrogance, stupidity, lack of foresight and greed, if there ever was one. However, CL-20/3

CL-20/1 the document can be condensed into three words, namely : "DUMP AND COVER", if one wants a basic overview of what NRC put in it, as that seems to be part of the main CL-20/4 desire of the nuclear industry/NRC (and D.O.E !), concerning what to do with the horrendous nuclear legacy of the atomic age . At the height of the Cold War, in the U.S., defense against the atomic bomb and the hydrogen bomb (which in essence CL-20/5 uses a fission - atomic- device/bomb/reaction to trigger the fusion reaction/bomb/device which triggers etc. etc. etc.) was an incredible defense which was called "DUCK AND COVER". They actually had the population believing that if you ducked under a door jamb, or under a desk at school, or under a table in the kitchen, you would survive nuclear war.. While this side of the Atlantic dutifully behaved like a bunch of sheep going over a precipice following the leader, the other side of the Atlantic, thousands upon thousands demonstrated against the insanity of the arms race and nuclear weapons in general. Why was there a difference in behavior ? Because, just like today with this issue of nuclear waste and "decommissioning", (a word everyone swallows it seems - must be a new made up word as it is not in my huge old dictionary) - there was/is almost no discussion of the issues in the press, and no education on the issues, and this is purposeful. There is, and has been, press interference on the issues - by both industry and governments.

CL-20/2 The nuclear issue is the most important issue facing humanity and has been since the atom was first split. The nuclear issue is the Sword of Damocles over the planet and all future generations should we survive the next decade, (as I write India and Pakistan are once again on the verge of war, only they now have nuclear

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E-RIDS = ADM-03
Add = H. Hasnik (HTM2)

2

weapons, thanks to the fact that they got both nuclear power plants and research reactors,-get those, and with enough money and infrastructure and a government willing to squander billions, just like the Soviets, the British, the US, the French, the Chinese, the Israelis, the South Africans under apartheid, did,-and sooner or later you've got yourself a bomb- THE BOMB - (that old nuclear power/atomic bomb connection no one wants to mention.) You mean NRC thought no one realized the nuclear power route was just a diversion so the public wouldn't realize they were running plants to produce extra plutonium for weapons if needed ? Oppenheimer SAID so. Besides, anyone with common sense could figure that out. Just as anyone with common sense can tell this Draft Supplement 1 to Nureg-0586 will have dire consequences if implemented in its current form. It always amazes me how the Nuclear Regulatory Commission INVENTS its own laws and standards - its own regulations, its own definitions (such as "decommissioning" see p.xii) and most of the public doesn't realize (if they did, it is safe to assume they would probably horsewhip the Commission out of town) what a sham it all is and how industry writes its own ticket. For example, p. xii, the Commission has concluded (says the Commission) that <u>impacts that do not exceed permissible levels in the Commission's regulations are considered small.</u> In other words, using made up regulations based a great deal on that appalling, criminally negligent outfit the ICRP, (one of the dumping grounds for Manhatten Project scientists post WWII - for anyone reading this from the younger generations, the Manhatten Project was the name of the project that built the atomic bombs dumped on Hiroshima and Nagasaki) and its the ICRP's early determinations that they would set allowable levels of exposure that were at levels that would allow the emerging atomic energy industry, and everything that went with it, to operate with all the releases which they knew and admitted would cause genetic damage, but they decided it would be acceptable to damage sperm and ovum . To damage countless generations (until they die out) to cause countless birth defects, countless miscarriages, countless cases of spina bifida - look at South Carolina, nuclear power plants and the Death of the Earth squad's Savannah River Nuclear Site and the highest spina bifida rate in the US. CL-20/6 NRC has absolutely no basis to say whether impacts will be small etc. based on that

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CL-20/7 sort of garbage. The great R.M. Sievert (after whom the unit the Sievert is named) pointed out that there was no level below which radiation did not cause damage, no threshold that must be exceeded for damage to occurr, yet NRC says a threshold must be exceeded for effect to occur, I believe Sievert. The ICRP standard of 5Rem per year is based on a principle called risk/benefit that allows a one in five thousand chance of contracting cancer. In other words, the death or cancer risk is the workers and the publics' , the benefits are the dollars flowing to the industry and the NRC (from the industry in return for NRC services and licenses etc) The NCRP also pushes the 5 Rem standard - this is the same bunch of bozos who in trying to refute the world renowned findings of Dr. Alice Stewart and the famous Oxford Study accepted worldwide, that showed x-raying a develloping fetus caused a major increase in childhood cancer - claimed obstetricians had x-rayed those fetuses which they somehow KNEW would get cancer, which explained why the x-rayed fetuses went on to get childhood cancer!!,(See "The Woman Who Knew Too Much - Dr. Alice Stewart and the Secrets of Radiation" by Gayle Greene. Read it and learn all about the Commission and its buddies. Read it and weep for humanity, then , if you have something called a concience at the NRC, go do something about this Draft so it is no longer an industy wish list.) The ALARA principle that NRC uses which basically says that doses must only be kept As Low As Reasonably Achievable (ALARA) based on the state of the technology and the amount of money spent by the industry - what Dr. Gofman calls "planned deaths" as NRC knows -

CL-20/8 is referenced by NRC many times, and the Draft even says during licensing the applicants commit to implement ALARA programs. The combination of ICRP, NRC, NCRP and ALARA standards is, and has been a recipe for premeditated murder and/or illness,

CL-20/9 genetic damage and great suffering as it is, NRC saying that it has not established standards to biota other than humans on the basis that limits established (by the aforementioned) for the public would provide adequate protection for other species is outrageous and contrary to what has been established for decades. Plus, to

4

then cite the bozos at NCRP again, saying that the "fate of individual non-human organisms is of less concern than the maintainance of endemic population," shows A COMPLETE LACK OF UNDERSTANDING OR COMPREHENSION OF THE WEB OF LIFE AND THE NATURAL WORLD. The effects of ionizing radiation exposure on ALL life forms includes: sterility and genetic damage which can lead to extinction.(Think fruit flies and Herman Muellers experiments which gave him a Nobel Prize. Think the

CL-20/10 effects to fish, proved years ago.) When thinking about exposure to plants and animals and fish, one needs to take the effects to an infant and to a child in the womb to better approximate the effects to wildlife, the smaller the non-human entity (e.g. a bird, a frog) the child in utero down to embryonic level would be appropriate. We all know what happens when an embryo is exposed - namely death or or severe damage. The same happens to birds eggs. The International Atomic Energy Agency is about as trustworthy on the radiation dose issue as Attila the Hun would have been on the gentleness issue - the IAEA has a charter that states its sole purpose in life is to push all things nuclear, just what does NRC expect them to say ?

Almost 50 years ago, the Georgia ecologist Eugene Odum, who did a lot of work for the Atomic Energy Commission/DOE (a fact that is not now widely known) under contract, wrote of the need to "accelerate the study of the function of intact biotic communities in order that the total radiation effects can be evaluated" of the need for "an understanding on the long term influences of low level radiations on aquatic and terrestrial environments into which the by-products may be released," and that it was concievable "that every large atomic power plant of the future will need a radiation ecologist to work with environmental problems outside of the plant" and that there was a need to train "young men simultaneously in the fundamentals of modern ecology and radiation biology in order that this inevitable need can be met." How terribly sad - the NRC has one doctor for the entire NRC. Radiation biologists ? Stop me before I scream. It is obvious that an inventory of all life forms on a site should be made and that they be screened for chromosome aberrations and radioactive contamination, then

5

a similar comparison be done at a site as similar as possible to the plant site about twenty miles away upstream and out of the predominant windpath on a thirty year wind rose. It would not be half as good as one would want, but it would be better than nothing and establish some differences and give a better idea of the contamination problems, even though a site twenty miles away will have recieved some airborne deposition from the plant. In terms of aquatic species, the record from State sources and the licensee on tests run on fish/mussels etc. can be used and compared to the fact, repeat FACT, that contaminants such as Cobalt-60, Sr-90 Cs-137, H-3 above the minute natural burden, plutonium etc. are not natural and should never be found in fish, mollusks etc. and one can look for chromosome aberrations. Diatoms can be examined for bioaccumulation of the uraniums from the plant. Centuries hence - in some cases decades - a measure of aquatic health would be the decrease in levels of contaminants found in species and decrease in aberrations etc. It is vital, that contaminated sediment found downstream (and also some upstream due to airborne deposition on water sinking down) be removed for many miles downstream. This should be done by perhaps sucking it up via vacuum type hoses as opposed to dredging which could dislodge and spread the contamination further.

With regard to plant life, microorganisms etc. one could compare plant seed production of say twenty species on site, with production twenty miles away, and number and type etc. of microorganisms likewise. as well as radioactive contaminat -

CL-20/11 ion. I don't really know why I am bothering to write all this, as the NRC will ignore it anyway, but hope springs eternal as they say. If we don't have comparisons, we can't have at least some idea of what constitutes the start of a return to a more unpollutted site, and we can't establish what needs bulldozing and taken to a radioactive waste national sacrifice area.

CL-20/12 THERE SHOULD BE ABSOLUTELY NO UNRESTRICTED USE OF THE PROPERTY EVER. THE ADDITIONAL EXPOSURE IS TOTALLY INSANE. WHEN DR. KARL MORGAN WAS ALIVE * THE FATHER OF RADIOLOGICAL HEALTH PHYSICS, FORMERLY WITH OAK RIDGE FOR DECADES, HE SAID LESS THAN ONE

CL-20/13 MILLIREM PER YEAR ONLY WOULD BE PERHAPS ACCEPTABLE FROM ALL PATHWAYS. THERE NEVER

6

SHOULD BE A LACK OF INSTITUTIONAL CONTROL EITHER.

CL-20/14 The Technical Specifications and what the facility was allowed to dump under the license are outdated and bear no resemblance to current knowledge and should

CL-20/15 be junked and the whole thing done over. Furthermore, the way the environmental and water issues were looked at during the time of plant licensing were often equally awful. It all needs reconsidering.

What is ridiculous, is the worry about messing up the environment while decommissioning the dump. For crying out loud, every second the plants are runniing they are contributing to ecological ruin, at the microscopic level, and impacting human health to a distance of approximately 100 miles.

CL-20/17 This Draft 1 references MARSSIM (Multi-Agency Radiation Survey and Site Investigation Manual.) I commented on the Draft, never saw the final, never heard from anyone again on it. It was mindnumbingly awful. Put together by some people from NRC, DOE, Dept. of Defense, and EPA. Industry was represented big time. In it the DOD said how committed it was to protecting the environment - this from an entity that had left thousands of contaminated sites on and off bases, themselves requiring an estimated (govt. estimate) $100 BILLION to $200 Billion to cleanup worldwide. In its introduction, Draft "Marssim" did not address all sorts of things - from contamination on vicinity properties through contaminated subsurface soil, water, construction materials and on and on. All of which must be cleaned up/have the contamination removed. They showed a lack of understanding of the groundwater cycle, and groundwater issues JUST LIKE THIS DRAFT DOES (in fact I'm still looking

CL-20/18 for it to be addressed), Groundwater is used by countless communities, groundwater is eventually released to surface and other water bodies and, as groundwater onsite is usually radioactively contaminated, (At Plant Hatch they contaminated it by 1979 and that was just for starters) it is a SERIOUS issue that MUST be dealt with, groundwater that is contaminated MUST be pumped out etc. (Refers to what I said in earlier comments) THIS GROUNDWATER CONTAMINATION ISSUE IS ANOTHER REASON

CL-20/19 WHY "RUBELIZATION" MUST BE FORBIDDEN. THE CONTAMINATION IN WHAT THEY WANT TO RUBELIZE AND BURY WILL LEACH TO THE GROUNDWATER AND DIRECTLY IRRADIATE SOIL AND MICROORGANISMS. The industry just wants to save money and "dump and cover".

7

CL-20/20 The fact that the Staff and the Commission have even considered rubblization.
shows an utter disregard for the health and welfare and safety of the public
CL-20/21 and the ecosystem upon which life depends. Anything dumped or buried from the past
practices on site must also be dug up and removed.
CL-20/22 To find out the extent of past problems, and contamination levels, IT IS VITAL
THAT THE NRC, THE LICENSEE (as some are new owners/licensees), AND THE CONTRAC-
TORS AND SUB-CONTRACTORS, GET ALL Reports of ACCIDENTS, LICENSEE EVENT REPORTS, VIOLATIONS,
INSPECTION REPORTS, SPILLS AND CONTAMINATION EVENTS FROM THE DOCKET FOR THE
REACTOR AND SITE IN QUESTION, AND BLOODY WELL GET OFF THEIR REAR ENDS AND EARN
THEIR MONEY AND READ THEM. THEY NEED THE WHOLE LOT, SINCE START-UP, EVEN IF IT
TAKES TWO MONTHS TO READ THEM. I AM SICK AND TIRED OF EVERYONE, NRC INCLUDED,
REFUSING TO READ THOSE REPORTS FROM THE DOCKET AND IN THE PUBLIC DOCUMENT ROOM. CL-20/28
THEN, AS THE LICENSEES USUALLY PUT A GOOD SPIN ON IT, PEOPLE SHOULD REALIZE THE
PROBLEMS LISTED WERE PROBABLY WORSE. Another issue, which I touched on in my
comments on MARSSIM, was the fact that in the real world, many people can not
read or write very well, and if things are contracted out, this could have
CL-20/23 serious consequences. NRC must stipulate, that ALL CONTRACTORS AND SUB-CONTRAC-
TORS RIGHT DOWN TO THE BACK-HOE OPERATORS MUST BE HIGH SCHOOL GRADUATES. Cleanup
cannot just be dished out to any contractor, all involved should not only have a
stirling track record, but experience in nuclear fields. There should be a radiation
biologist on site, plus a health physicist, plus a wildlife biologist with a CL-20/29
knowledge of radiation effects, plus there must be federal and state oversight CL-20/30
CL-20/24 ON THE SITE at all times. I noticed that the Draft blabbers on about OSHA standards-
YET FAILS TO MENTION THAT OSHA DOES NOT COME ON SITE AND IS NOT ALLOWED TO ACCORDING CL-20/31
TO OSHA, EVERYTHING IS UNDER NRC. So let's print the truth shall we ?
CL-20/25 The Draft says, p.1-6, that the NRC and the Commission are not considering the issue CL-20/32
of spent fuel storage (in a pool or in one of those ridiculous casks outside in CL-20/33
plain view for every terrorist to see) as part of decommissioning. The excuse is
CL-20/26 that it's dealt with under other license aspects. It also says that the Commission
has made a finding that the DEADLY, RADIOACTIVE SPENT FUEL CAN BE STORED SAFELY

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AND WITHOUT SIGNIFICANT ENVIRONMENTAL IMPACTS FOR AT LEAST THRITY YEARS BEYOND
THE LIFE FOR OPERATION ETC. ETC. IS THE COMMISSION OUT OF ITS COTTON-PICKING MIND?
CL-20/27 Those issues are of grave concern. What happens , if during decommissioning (i.e.
during "dump and cover", amidst much licensee laughter about how they stuck it to
the rate payers and taxpayers and local community yet again) terrorists take out
three spent fuel casks blasting them to kingdom come (the Milan anti-tank weapon
would do that, as I wrote NRC before) OR two casks had a major problem and needed to
be opened under shielding inside the spent fuel pool and there was either no room
in the spent fuel pool or the cask came apart while trying to move it due to em-
brittlement of the cask from the radioactive decay heat coming off the spent fuel ?
Whatt will NRC do, what will the licensee do , send for Ghostbusters ?
Under Water Quality p.4-10,4-11 The NRC must stop giving the impression that
it is a sheer chance that nuclear reactors are located on water, when in fact they
require millions of gallons of water a day to operate and that water source is con-
sidered the ultimate heat sink in the case of a meltdown - it'll ooze on down the
river, hissing and sputtering like a volcano hitting water. NRC assumes compliance
with NPDES discharge permits for non-radioactive contaminants (NPDES and the Clean
Water Act do not cover most radioactive contaminants, this was purposeful, so industry
and the armaments crowd could do what they liked,) however, NPDES permits are
often violated or bypassed - just look at the NPDES situation in Georgia as one
example. Discharges should never have been allowed without prior cleanup and should
not be now. Surface and groundwater quality, p.4-12, should NOT be considered a ge-
neric decommissioning issue - climate zone can also create unique problems, terrain
likewise, it should be site specific. Air quality issues, p.4-12 etc., do not address
the fact that HEPA filters are about as good as useless for radioactive particulate
holdup and sand filters should be added as well. All workers must have self-contained
breathing systems (moon-suits) . The area being worked in should be covered to con-
tain dust if it means covering the whole site with a tent with an adhesive inner
surface to capter particulates - after all if flypaper is good enough for the DOE
when it, like the NRC was called the AEC, to capture particulates on, a tent with

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some sort of a sticky undersurface is a step up! The point I'm getting
CL-20/34 at, is, one does not want radioactive and chemical particulate matter getting
CL-20/35 offsite if possible. If such a tent system were used, afterwards it would be disposed of as rad waste. Also, workers and the public MUST understand the fact that one can not clean up radioactive contamination, only contain it to some extent and remove contaminated materials to better sites where they can be better contained - in other words to national sacrifice areas remote from all human habitation and far from water sources, where wild life is fenced out.
CL-20/36 Regarding aquatic ecology p.4-16, as touched on earlier, the environmental impact statements originally written for the plants were often very poor, and did not mention that the discharge water would be radioactively contaminated nor that sediment would be contaminated for miles etc. In the long term, if the contaminated sediment is removed and no further radioactive and chemical releases
CL-20/37 are made to water and air, the aquatic ecology can only improve. Water quality should continue to be tested for radioactive contaminants for at least 600 years which is the full radioactive hazardous life approximately for cesium-137 which is a contaminant of concern in fish and shellfish as it migrates to muscle in
CL-20/38 particular. The aquatic ecology issue should also be site specific, for example, Plant Hatch in Southern Georgia had a massive spent fuel pool spill which contaminated not only the river and sediment but also a huge wetland area which has many creatures feeding in it and becoming contaminated, including threatened and endangered birds. And on the endangered bird subject, let me address the
CL-20/40 Migratory Bird Treaty Act of 1918 - (p. 4-20) It is a proven fact - proven by the old Atomic Energy Commission and its contractors,- that migratory birds become contaminated eating seeds, drinking water and so on at radioactively contaminated sites, wetlands areas etc. and the birds carry this contamination in their bodies worldwide. NRC, DOE and licensees violate the MBT by not protecting birds from such contamination, and by spewing radioactive noble gases out that impact passing birds. No wonder birds are declining. This is one of the reasons I suggest that netting or similar should be placed over the sites in

10.

question, fine wire mesh set at an angle that can have leaves and other debris hosed off it, it must be small enough to keep birds out down to the size of hummingbirds. Enclosed, such an obscene site poses slightly less of a threat to birds and other wildlife, the utilities can pay for it all, it can come out of the salaries of the top management and company owners. NRC better set it up now, before they all pull an "Enron" - i. e., an "end run" round everyone.
CL-20/41 I notice that the General Accounting Office has slammed the NRC for its lack of oversight of transfers and mergers in the nuclear industry and had not verified that new owners would have guaranteed acess to the decommissioning charges that their affiliated utilities would collect, in some cases, plus, a host of other safety and other issues were raised, all of which are troubling. The NRC must immediately address problems, and should demand that companies provide enough money for oversight - to include security staff, maintainance staff, nuclear engin-
CL-20/42 eers, radiation safety officers etc. - essentially forever. Even after all fuel is removed from the site and the entire structure is removed, the site will still be radioactive forever and still need a security person, basic maintainance person (for upkeep of fences, gates, runoff detention ponds etc.) and regular visits from
CL-20/43 a radiation safety officer. It is absurd that NRC states that "decommissioning activities do not include the maintainance, storage or disposal of spent nuclear fuel, or the removal and disposal of nonradioactive structures and materials beyond that necessary to terminate the NRC license.....they are not considered as a cost impact because the licensees are not required to accumulate funds for these activities." (See p. 4-42) Why not ? This is an outrage! The NRC must pass a Rule at once requiring such money be set aside, some of it perhaps in form of gold and silver bullion at bank deposit in case of financial collapse. The fact of the matter is this: the licensees must be held responsible and accountable for everything about and on the site and generated by the site past, present and future. As NRC states (p.43) local jurisdictions may impose stricter "cleanup" or waste
CL-20/44 or contamination containement and this will cost more. The NRC should add a 10% surcharge to any calculated fees for decommissioning to help cover those costs

11.

CL-20/45-46 that are unforseen which may arise. And of course they must pay for the "spent" deadly radioactive fuel storage at the sites, whether in pools or casks at ISFSI's and the maintainance and upkeep and security and waste handling and fire preventiom and similar. This MUST be addressed as part of this decommissioning, it must be

CL-20/47 incorporated. THE COSTS MUST NOT BE PASSED ON TO THE RATEPAYERS as NRC says they

CL-20/48 are currently. Furthermore, the most expensive estimate should always be assumed for everything as a wise precaution. NRC lists the decommissioning costs in MILLIONS as estimated by the utilities - however, NRC WELL KNOWS THE COSTS ARE IN THE BILLIONS WHEN EVERYTHING FROM SPENT FUEL ON DOWN IS FACTORED IN, AND THAT MUST BE REFLECTED, PLUS THE NRC INSPECTOR GENERALS OFFICE SHOULD GO OVER ALL ESTIMATES

CL-20/49 MADE BY UTILITIES TO SEE HOW TRUSTWORTHY AND ACCURATE THEY ARE. Inflation must also be added to costs.

CL-20/50 Regarding the loss of local tax revenues due to "decommissioning". The utility must be required to notify the local government as far in advance as possible that they will lose taxes. The fact that the local government should never have allowed such nuclear dumps, posing as power plants, into their communities is another issue. They need to understand that they better diversify their tax base in a hurry.

CL-20/51 HOWEVER, the nuclear industry - the entire industry - (from nuclear plant owners to uranium enrichment plants to users of radiation for medical experiments posing as "therapy" etc) should have a tax levied on it by NRC to be paid into a special account to go towards compensating the communities. An additional tax can be levied on them yearly in the form of a small, flat fee which would help pay for the NRC and the EPA to do quarterly inspections at facilities, in perpetuity.

CL-20/52 Before I forget : NRC MUST MAKE LICENSEES, CONTRACTORS, SUBCONTRACTORS AND ANYONE WHO WORKS ON DECOMMISSIONING TAKE THE EFFECTS OF RADIOACTIVE "DAUGHTER" PRODUCTS INTO CONSIDERATION AS THEY MAY HAVE VERY DIFFERENT PHYSICAL, CHEMICAL AND RADIO-ACTIVE PROPERTIES THAN THE RADIOACTIVE "PARENT". THIS MUST BE PART OF DECOMMISSION-ING STANDARDS. MARSSIM basically ignored that, another reason their Draft was so

CL-20/53 awful. NRC seems to have ignored it in this Draft also. This is an important health and also environmental issue that cannot be ignored.

12.

CL-20/54 Regarding Occupational Dose and nuclear power plant exposure data (p.G 12, etc) The regulatory limits for exposure were not set based on medical reasons but were set in order to enable the industry to operate - that is historic FACT - because what people are being exposed to is either not found in nature (i.e.

CL-20/55 it is man-made) or found in nature at far, far lower levels. The exposure allowed by regulation is, in fact, slow death, and furthermore, worker doses can't always be trusted because of faulty measuring equipment, horror stories of workers being told not to wear their dosimeters periodically, and so on. The dose recieved also has a different effect on each person depending on age, sex, current and past health status and many other factors, plus each organ is affected differently. The fact that the ICRP, DOE, NRC etc. didn't know what on earth they were doing -other than guesswork - regarding exposure levels set, is shown by the fact that they had to keep adjusting the "allowable" regulatory limits down-ward. A sort of continuous "Oops, we screwed up ! But don't worry, this time we've got it right." All the blather on "Risks" from radiation exposure can't hide the fact that it kills - not just cells here and there - such as cells about to form the septum of a babys heart so the child is born with a hole in it's heart, because a bunch of murderers at the ICRP decided the risk was acceptable - but it kills people. To KNOWINGLY ALLOW PEOPLE TO BE EXPOSED TO SOMETHING THAT WILL KILL A CERTAIN PERCENTAGE OF THEM, HAS A NAME, PREMEDITATED MURDER * JUST BECAUSE A REGULATION WAS WRITTEN SAYING ITS OK, DOES NOT CHANGE IT. Further, the ICRP does not consider effects manifested after the second gen-eration in assessing the genetic risks to workers offspring (p.G 5) again showing they don't give a damn about the workers and their families and whether or not workers great grandchildren are born deaf, or with learning disabilities, or

CL-20/56 unable to reproduce. For the Draft to take the attitude of "well, the doses at plants being decommissioned are generally only a small fraction of doses at operating plants " p. G.13 is no comfort, and all the charts show, concerning Occupational doses(page G 14 and on), is thousands upon thousands of contaminated workers . It is obvious that this contamination of workers (and the environment)

13.

must be massively reduced.

CL-20/57 I noticed that it said cutting methods included abrasive water G-17, but in any case where there is plutonium contamination or depleted uranium metal, that all is meant to be cut under heavy oils and mushh else besides, Since many of the c_omponents will have been contaminated with plutonium, or were made of depleted uranium (when is the NRC going to te_ll the public that DU is NOT radioactive

CL-20/58 waste.?) it is obvious that the reactor vessel should NEVER be cut up, but do what was done with the Trojan vessel (p. G-18, remove the whole thing offsite)

CL-20/59 However, the vessel should have additional shielding placed around it prior to placement on the heavy haul trailer, and upon arrival at the disposal site it

CL-20/60 should be further encased in what would amount to a giant burial cask. Removing the vessel offsite massively reduces worker doses, water contamination and the c ontamination to the local community and the environment. Obviously, the spent fuel is /has been removed from the reactor vessel and all liquid radwaste etc.

CL-20/61 too ! UNDER NO CIRCUMSTANCES SHOULD A FACILITY BE ALLOWED THE OPTION OF CHOOSING

CL-20/62 THE METHOD OF DECOMMISSIONING IT WANTS, AS IS THE CURRENT CASE. Combinations of DECON and SAFSTOR would be the best, however, under no circumstances should SAFSTOR continue past five years (the regulation should be changed, as to expect that oversight will continue for 60 years at such sites is ridiculous) that would enable workers familiar with the plant to be still available, but at the same time allow for the decay of some of the radioactive contaminants which have shorter full hazardous radioactive lives prior to removal ,thus lowering

CL-20/63 worker exposure etc. NO WAY THIS SIDE OF HELL SHOULD ENTOMB I OR ENTOMB II BE ALLOWED. BOTH STAFF AND THE INDIVIDUAL COMMISSIONERS SHOULD BE CHARGED WITH CRIMINAL NEGLIGENCE – ALONG WITH THE LICENSEE – IF THEY PUSH THAT THROUGH, AND I AM CONFIDANT THAT MANY WOULD ENSURE SUCH CHARGES ARE FILED. THERE IS INDIVIDUAL RESPONSIBILITY CONCERNING THESE MATTERS, AND IF NRC CANNOT UNDERSTAND WHY THE ENTOMB OPTIONS ARE AN ABSOLUTE NO-NO, THOSE WHO CAN'T GRASP THE "WHY" PART SHOULD RESIGN AND STICK TO SOME EMPLOYMENT WHERE THE USE OF THE BRAIN IS NOT HIGH ON THE

14.

LIST OF JOB REQUIREMENTS.

CL-20/64 It appears that the nuclear industry has written its own ticket , as usual, on the issues in the Draft. P. E-5 notes the help from the Nuclear Energy

CL-20/65 Institute in gathering information. HOW ABOUT THE NRC ACTUALLY READING THE INSPECTION REPORTS AND VIOLATIONS ETC. ON THE DOCKETS OF EACH FACILITY AS I

CL-20/66 SAID EARLIER . HOW ABOUT TESTS BEING RUN BY THE NRC ON THE SITE .HOW ABOUT INTERVIEWS WITH LONG TIME STAFF CONCERNING PAST PROBLEMS THAT COULD BE EN-

CL-20/67 COUNTERED? NRC should take its own independant samples of offsite water and sediment and soils, as well as onsite.

The NRC must not go by the original Offsite Dose Calculation Manuals as what was allowed in them, went out with the ARK – i.e. the levels were terrible, a recipe

CL-20/68 for radioactive pollution. I cannot stress enough that the groundwater issues

CL-20/69 are not adequately addressed. The use of high pressure water sprays is obscene.

CL-20/70 WHAT IS WRONG WITH THE NRC ? DOESN'T NRC UNDERSTAND THAT ONE CANNOT DECONTAMINATE SOMETHING RADIOACTIVELY CONTAMINATED IN THE TRADITIONAL SENSE, UNLIKE WITH A CHEMICAL OR OTHER CONTAMINANT, WHATEVER IS DONE TO SOMETHING RADIOACTIVE DOES NOT CHANGE THE CHARACTER OF THE RADIATION, IT CONTINUES TO EMIT ITS DEADLY ALPHA, BETA, GAMMA , NEUTRON ETC. RADIATION THROUGH THE FULL RADIOACTIVE HAZARDOUS

CL-20/71 LIFE. YOU CAN'T BURN IT/ INCINERATE IT, IT GOES OUT THE STACK AND POLLUTES THE STACK, YOU CAN'T WASH IT, IT WINDS UP ALL OVER THE PLACE AND IN THE WATER, IT IS ALWAYS THERE, THE DEADLY, INVISIBLE KILLER . AT MOST YOU CAN TRY AND CONTAIN IT. The Tritium can't even be contained.

CL-20/72 The original site maps and drawings and photos made during construction should be consulted (some building techniques may have changed) all modifications and revisions should be tracked down. All vent systems should go through both HEPA (for the chemicals) and sand filters. Additional containment should be added around spent fuel pools including over the top and beneath it, extra supports, new liners. They will suffer serious embrittlement and activation,

CL-20/73 same goes for the casks. Such issues must be addressed. Again THERE MUST NEVER BE A PARTIAL OR FULL SITE RELEASE. ALL PROPERTY DEEDS MUST STATE THE SITES ARE

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NOT ONLY RADIOACTIVE, BUT SUPERFUND SITES, AS THAT IS WHAT THEY ARE. THE RIVER, LAKE, OCEAN BEACH STRETCH OR WHATEVER IS NEXT TO THE SITE SHOULD BE POSTED AS RADIOACTIVE ALSO, EVEN IF THE SEDIMENT IS REMOVED, AS IT IS IMPOSSIBLE TO GET EVERYTHING.

CL-20/74 Security must be upgraded, not downgraded.

CL-20/75 No structural remains should be sent to local landfills - the landfill will be
CL-20/76 radioactively contaminated more than at present. As all landfills leak, it will
CL-20/77 go to the groundwater and migrate offsite. None of the mixed-waste should be dealt with as mixed waste (i.e. a combination of chemical/hazardous and radioactive) because MIXED WASTE FALLS THROUGH ALL REGULATORY CRACKS, BUT IT SHOULD BE TREATED
CL-20/78 AS RADIOACTIVE WASTE. WASTE OILS SHOULD NOT BE SENT TO VENDORS FOR INCINERATION OR RECYCLING OR REUSE AS THEY ARE CONTAMINATED.

CL-20/79 EVERY SITE, OPERATING OR NOT OPERATING, IS A PRIME TERRORIST TARGET AS I HAVE
CL-20/80 SAID FOR DECADES. THE SPENT FUEL IS THE ULTIMATE IN TERRORIST TARGETS.
CL-20/81 Years ago, when people spoke of some type of monitored, retrievable spent fuel storage, they meant monitored, so repairs could be made by remote control if needed, and retrievable so problems could be addressed - no one in their worst nightmares with any sense, ever imagined that a bunch of nuclear bozos would be allowed to stick the most deadly stuff known to humanity in a cement and metal barrel and stick it outside in plain view. Spent fuel is the stuff (ALL TOGETHER NOW...) that the Department of Energy has been charged with trying to contain for approx. 10,000 years removed from the biosphere, after which it becomes the radioactive blob from hell under whatever piece of dry land they stick it. That assumes they can contain it for 10,000 years, which I doubt. I have many concerns with the Yucca Mountain site. I will not elaborate on here, but will mention that the "dump it on the Native Americans" idea is odious and immoral in the extreme. Yucca Mountain is sacred to them. That having been said, the site is already contaminated due to fallout from the weapons tests, and Nevada's belated concern about radioactive issues is hypocritical and distasteful, as this is the state that did not give a damn that hundreds of nuclear tests were conducted on Indian

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CL-20/82 land (The Western Shoshone Nation, AKA the Nevada Nuclear Test Site) that blew radioactive fallout across the nation causing serious illness, birth defects and cancers, besides doing the same to some nearer the site in Nevada. The only thing Las Vegas worried about, was if the tests shook their gambling tables according to press reports. When the wind blew towards Las Vegas they tried not to test. For Nevada to now whine that they don't see why they should get the spent nuclear fuel as they have no reactors - power reactors - is obscene, considering that a huge Curie quantity of the spent fuel was generated making/creating the plutonium and the tritium for the nuclear weapons most of them supported and didn't care that the fallout dumped on their fellow planetary citizens. The fact that there were, and are, some small groups who were, and are, against the weapons and the testing and the horrors of nuclear power does not alter the fact that the State didn't protest. The State's current protests, even if valid for other reasons, ring hollow against that history of nuclear collaboration when they use the "no power reactor" excuse to keep the waste out. It is time history was set straight.

CL-20/83 The NRC in this Draft says p. D-2 that the temporary storage or future permanent disposal of spent fuel at a site other than the reactor site is not within the scope of this Supplement. Why the hell not ? It MUST BE, OTHERWISE THIS DRAFT IS

CL-20/84 EVEN MORE MEANINGLESS. THE SPENT FUEL IS THE MOST SERIOUS ISSUE THERE IS. ANYONE WHO DOES NOT UNDERSTAND THAT SPENT FUEL CANNOT BE LEFT WHERE IT IS ON SITE, IN POOLS OR ISFSI'S BEYOND A VERY LIMITED NUMBER OF YEARS, BUT MUST BE PLACED DEEP UNDERGROUND, IN A DRY LOCATION, GEOLOGICALLY AS SOUND AS POSSIBLE, MONITORED FOR ETERNITY, DOES NOT UNDERSTAND RADIATION OR THE NUCLEAR ISSUE AND SHOULD NOT BE WORKING FOR THE NRC. NRC MUST BITE THE PROVERBIAL BULLET AND SET THE TIME WHEN THE SPENT FUEL SHOULD ALL BE REMOVED OFFSITE AS NO LATER THAN TWO YEARS AFTER THE LAST CORE OFFLOAD HAS SPENT TEN YEARS IN THE SPENT FUEL POOL, I.E. FROM SPENT FUEL REMOVED FROM THE REACTOR INTO THE SPENT FUEL POOL AND THEN THE TEN YEAR "COOL DOWN" PLUS TWO YEARS, (A SAFETY MARGIN), AFTER WHICH IT MUST BE MOVED. IF SUCH A DEADLINE IS NOT DECIDED, AND SET, COMMUNITIES ARE GOING TO BE STUCK WITH

17.

IT , WITH AWFUL CONSEQUENCES.

The "Mobile Chernobyl" issue - the dangerous moving of the spent fuel to a REPOSITORY , can be somewhat alleviated by addressing the concerns people

CL-20/85 have, instead of ignoring them, as follows : The Draft shows the awful DOT and NRC regulations for transport and radiation levels allowed p. 3-14, these should be changed to be massively lower, this can be done by better shielding and more shielding and the transport of fewer assemblies per cask or fewer rods per cask, and shielding that is thick enough that anti-tank weapons would not penetrate through to the fuel. Disguising the shipments is not an option due to the size of the casks, therefore far stricter security i.e. military escorts and the sealing off of roads ahead of transports would be a

CL-20/86 must. The NRC needs to pass rules on these issues, and put out orders for more and better transport casks and vehicles. All shipments of LLW should also fall under these better packaging and shielding standards. If the NRC does not address all these issues as part of decommissioning, future generations (that means YOUR children and grandchildren) are going to die due to NRC's lack of

CL-20/87 actions today. It is murderous that potential radiological impacts following lice nsing/license termination that are related to activities performed during decommissioning are not in the Supplement - this allows the licensee to slowly murder a community as the radiological criteria for license termination

CL-20/88 by NRC was woefully inadequate anyway. The NRC must continue to monitor sites FOREVER after license termination in case of sudden increases in radiation levels from a source on the site no one had either considered or knew was

CL-20/89 there. All sites should have audible(sirens) alarms that are triggered during decommissioning , and after decommissioning, when monitors exceed the EPA levels EPA allows, but reduced below what EPA allows to give an advance warning.

Such audible alarm systems are absolutely vital also during the the time radioactive spent fuel is still on the site, these alarms should be at various locations onsite, including next to the spent fuel pool and one above it, and next to an ISFSI/cask area and suspended on a wire or pole above it. The alarms should be audible miles offsite via relay loudspeakers.

18.

CL-20/90 Under "Dose to members of the public" p. G-19, and following pages, the doses to the public are listed in the usual deceptive and innacurate manner.

CL-20/91 The radioactive material releases is not released in stringently controlled conditions, technical specifications are often violated, monitoring is only

CL-20/92 done at select locations and frequently monitors don't work, emissions are allowed to be averaged out to make them appear less, and there is no independant

CL-20/93 monitoring and utilities do and say whatever they please. Tritium can't be

CL-20/94 contained. The direct gamma radiation coming off the plants to the public is the equivalent of a continuous X-ray emanating from their midst. No X-ray is "negligable". (This sort of garbage was probably written by someone who is not a medical proffessional) . Often the plants DO NOT HAVE TO REPORT THEIR

CL-20/95 RELEASES UNTIL THOSE RELEASES REACH A CERTAIN LEVEL, IT DEPENDS WHAT THEIR

CL-20/96 LICENSE STATES. FOR THE NRC TO HAVE USED DATA FOR SOUTHERN COMPANY'S PLANT HATCH IS SICKENING - WHEN HATCH HAD THEIR DISASTROUS SPENT FUEL POOL SPILL, DID ANYONE ADD THE EXTRA DOSES AND CONTAMINATION IN ? THIS IS THE SAME HATCH

CL-20/97 WITH OVER 1200 WORKER CONTAMINATION EVENTS IN ONE YEAR. WHEN YOU CALCULATED THE RADIO-IODINES, DID YOU ADD IN THE HUGE RADIO-IODINE RELEASE OFF PLANT FARLEY THAT WENT OVER GEORGIA ?

CL-20/98 The point is, that no one asked to be exposed to ANY dose of radiation, and most people in surrounding communities don't even know they are being exposed, or if they know, they think they are being protected because they think there

CL-20/99 is a safe level of radiation, when of course even the NRC admitted back in the late '70's that there was no safe level.

CL-20/100 Perhaps most disgusting is that under "Consequence of Potential Accidents" p. I-16 the impression given is that spent fuel pool accident risks are low, when in fact NRC's own cited document shows, hundreds upon hundreds would die and also many spent fuel pools were highly vulnerable to catastrophic accident due to earthquakes and a lot more besides - spent fuel pool accidents would have terrible consequences. The fact that licensees determined that basically even if the damned site was hit by a meteor and a nuclear bomb and a

and a hurricane all at the same time (obviously I am being sarcastic) nothing would happen and there would be "no dose consequence" is to be expected as the licensee analyses are a bad joke.

CL-20/102 THE NRC SHOULD READ ITS OWN DOCUMENTS AND THE FAMOUS "CRAC-2 " REPORT DONE BY SANDIA LABS, THE NRC AND THEN CONGRESSIONAL OVERSIGHT BECAUSE TO PRESENT DATA TAKEN FROM LICENSING-BASIS DOCUMENTS WHICH HISTORICALLY HAVE DOWN-PLAYED ANYTHING THAT COULD HAPPEN IS OUTRAGEOUS, AND IF THERE IS STILL FUEL IN THE REACTOR AND A LOSS OF WATER COOLANT HAPPENS, EVEN IF THE REACTOR HAS BEEN SHUTDOWN RECENTLY, THERE WILL BE A MELTDOWN.

CL-20/101 I challenge any licensee and any NRC staffer, to walk into the area where the spent fuel pool is after the water has drained from the spent fuel pool, and try and refill the spent fuel pool with a garden hose (that is what they thought they'd do at the Georgia Institute of Technology Reactor) and see how well they can "mitigate" the situation before "offsite dose consequences could occur" -- they'd be dead before they could pick up the hose. To say that such an accident could be mitigated is the height of deception.

CL-20/103 On p. M-2 it says., under the glossary , under Background Radiation, that "the typically quoted US average individual exposure from background radiation is 360 mrem per year" It may be typically quoted, but it is a blatant LIE. For example, typical background radiation in Georgia is 42 mrem year according to the State (which recently upped it a notch probably due to the radioactive fallout on the State from nuclear power plants and the Savannah River Nuclear Site on its borders.) The definition of CONTAMINATION is also a LIE, in that

CL-20/104 it states that something is contaminated if it's in excess of "acceptable

CL-20/105 levels". There are no "acceptable levels" - the public does not accept any level of radioactive contamination -- plutonium, cobalt-60, Strontium-90 etc. or

CL-20/106 tritium ,radioactive iodine and so on and on - Contamination means : that some thing/someone etc. has been brought into contact with something that defiles or pollutes it etc. -- go look the word up - NRC must stop redefining words and lying about their meaning.

CL-20/107 What the NRC decides to do concerning decommissioning, is what the following

generations of children, wome, men, plants, animals, insects, birds, fish - all life, is going to suffer from, and die by. A small bunch of (mainly) men in an office complex in Washington, along with a few cohorts elsewhere, plus an immoral multinational polluting industry (in the business for money only) are seemingly se tting a set of criteria that will impact the whole world to no

CL-20/108 good end and cause great misery , in this Draft. Have you all no shame ?

CL-20/109 The radioactive components, parts, liquids i.e. anything part of or to do with or emanating from the structures and the site MUST NEVER BE RE-CYCLED, OR RE-USED.

CL-20/110 NRC MUST IMMEDIATELY CEASE ALLOWING , OR THINKING OF ALLOWING, RADIOACTIVELY

CL-20/111 CONTAMINATED SOIL TO BE RE-USED FOR ANYTHING. IT MUST FORBID THE MELTING, SMELTING OR RE-USE OF RADIOACTIVELY CONTAMINATED METALS, PIPING, PLASTICS, WOOD, (INCLUDING

CL-20/112 FORBIDDING THE BURNING OF WOOD) , ASPHALT, AND SO ON. IF NRC, EPA, THE DOE AND OTHERS DO NOT STOP THIS INSANE RUSH TO RE-USE, RECYCLE, DUMP AND COVER ETC. NUCLEAR MATERIALS, RADIOACTIVE MATERIALS, ACTIVATED MATERIALS ETC. , WITHIN FIFTY YEARS NO LIVING BEING WILL BE BORN WITHOUT SOME TYPE OF DEFORMITY, GENETIC ABNORMALITY, CHROMOSOME ABERRATION ETC. AND THE IMMUNE SYSTEMS OF EVERY LIVING BEING WILL BE SERIOUSLY COMPROMISED DUE TO RADIATION SUPPRESSING THE IMMUNE SYSTEM RESPONSE, AND ALL BECAUSE WE WILL BE COMPLETELY ENGULFED IN A MIASMA OF MAN-MADE, OR MAN ENHANCED, RADIOACTIVE CONTAMINATION.

I have written this on and off over a series of days after finding out

CL-20/113 the comment period had been extended. I recognize that it has probably been a waste of my time and will be ignored, as usual, therefore I am not bothering to write it again with every paragraph in the right place. In any event I speak, read and write three languages and the grammar and spelling in all of them suffers somewhat -

CL-20/114 but it is the content that matters. The fact is, wherever this radioactively contaminated refuse winds up - from spent fuel to contaminated rags - it can't be contained forever and will reach the environment, which is why it must go to a remote location, below ground. (none of this idiot parking lot out in Utah or Nevada cask storage either) in a dry, geologically sound (as far as possible in a moving planet) location where monitoring could alleviate problems that arise prior to reaching the public and wildlife. NRC must recognize that this "solution" -

while not a perfect solution, as there is no perfect solution to the nuclear waste issue, - is the solution that has been gone back to repeatedly over the decades, after thousands of studies contemplating what to do with the waste failed to identify anything better, or safer. What NRC and industry are proposing in this Draft, flies in the face of the thousands of prior studies by some of the worlds most renowned people who understand the horror of the dilema, and the ir conclusions. Leaving all this contamination on sites around the nation to contaminate and kill hundreds of communities is simply barbaric

CL-20/115 and must be stopped at all costs. Furthermore, no new nuclear plants should be allowed or built as they will just add to the existing contamination, and all operating plants should be shutdown to stop further "waste" - such as plutonium-

CL-20/116 generation. None should be re-licensed - the NRC should be ashamed of relicensing. This Draft is an absolute horror - for future generations who will suffer if

CL-20/117 this goes through as proposed, I would point out that on pages C-1 and C-2 are the names of those responsible for this abomination for reference in case of future lawsuits, so the public should make a note of that (this is, after all public record, what I have written). Plus the Utility in question and the ever helpful nuclear pushers at the NEI, should be remembered too, for their contribution to the nuclear nightmare.

CL-20/118 There is still time to correct all the serious problems in the Draft, still time for the NRC to turn from the path of wickedness and ruin the Draft Supplement and Gais will lead to if passed as is. Remember the Creator. Do not allow the further desecration of the world, the NRC will also be accountable to God one day for what it allows to be done to God's Creation. Think on that, and correct this Draft to the better.

Pamela Blockey-O'Brien.

Pamela Blockey-O'Brien.

Copies to: EPA, GEORGIA DNR/EPD, USFWS, GEORGIANS FOR CLEAN ENERGY, U.S. ARMED FORCES RADIOBIOLOGY RESEARCH INSTITUTE, CENTERS FOR DISEASE CONTROL, AND OTHERS.

11/9/01
66 FR 56721
21

From: "Sharon Guynup" <sguy@cybernex net>
To: <dgeis@nrc.gov>
Date: 1/19/02 4:37PM
Subject: comments on Decommissioning US Nuclear Power plants

CL-21/1 I am violently opposed to the Nuclear Regulatory Commission's proposal to further relax its decommissioning requirements for nuclear power reactors. This is nothing but a sellout to the nuclear industry-- which puts citizens at risk--with no recourse in case of liabilities.

This is wrong and dangerous.

Thank you for your time.

Sharon Guynup
Hoboken, NJ

RECEIVED
JAN 22 2002
Rules & Directives Branch

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

Letter 22, page 1

11/9/01
66FR56721
22

From: <sublimation@webtv.net>
To: <dgeis@nrc.gov>
Date: 1/19/02 10.57PM
Subject: decomissioning reactors: environmental impact supplement 1

CL-22/1 This is ridiculous!

http://community.webtv.net/sublimation/DisregardAllAdsHere

Template = ADM-013

E-RIDS = 03
Add = M. Masnik (MTM2)

11/9/01
66 FR 56721
23

From: "Fred Long" <ajlong999@earthlink net>
To: <dgeis@nrc gov>
Date: 1/20/02 8 59AM
Subject: DECOMMISSIONING NECLEAR FACILITIES

CL-23/1 Has the NRC no common sense at all?
Releasing radioactively contaminated materials into daily consumer use and commerce and unregulated disposal is a direct assault on humanity.
Don't let this happen.
AJ Long
20550 Earl St
Torrance CA 90503

Template = ADM-013

E- RIDS = ADM-03
Add- M. Hacnik (MTH2)

Letter 24, page 1

11/9/01
66 FR 56121
(24)

From: "rsja" <rsja@email msn com>
To: <dgeis@nrc gov>
Date: 1/20/02 2 03PM
Subject: Public comment on USNRC Decommissioning US Nuclear Power Reactors

To. Chief,
Rules and Directives Branch
Division of Administrative Services
Mailstop T 6 D 59
US Nuclear Regulatory Commission
Washington DC 20555-001

CL-24/1 I am appalled at the NRC's draft of decommissioning requirements for nuclear power reactors. The requirements should be made stricter not more relaxed!!!!!!!!!!!! I oppose the use of "Generic" listing of
CL-24/2 issues. I support "Site Specific" listing so that local communities can still raise issues they have.
CL-24/3 I support the designation of environmental justice and endangered species issues as site-specific, NOT generic.
CL-24/4 I oppose Rubblization but support its designation as site-specific.
CL-24/5 I Firmly oppose the "release" of radioactively contaminated materials into daily consumer use and commerce and unregulated disposal.

CL-24/6 This is common sense people. You need to start doing what is safest and in the best interest of the people of the United States and its land, NOT what is going to relieve the nuclear power companies of their responsibility to what they have created and profited off.

Citizen of the United States of America
Rachel Griffiths
2022 West Chicago Avenue
Chicago, IL 60622

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

11/9/01
66 FR 56721
(25)

From: <EdRussel@aol com>
To: <dgeis@nrc gov>
Date: 1/20/02 9 34PM
Subject: Decommissioning rule changes

Law Offices of
Edward T. Russell
725 Long Pond Road
Plymouth, MA 02360
508-224-2007

January 20, 2002

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

Re: Decommissioning Nuclear Power Reactors
Environmental Impact Statement Supplement 1

Dear Sirs:

I am a resident of, and practice law in, Plymouth MA. For years I have lived at peace with the neighboring Pilgrim nuclear plant. However, Sept 11 was an awakening for me and for many others in eastern Massachusetts.

CL-25/1 I strongly object to the proposed changes to the decommissioning rules. We have recently become more sensitive to the rules governing nuclear power plants, even their decommissioning Since these proposals were begun before September 11, I hope and expect that they will be dead on arrival at the Commission.

CL-25/2 The only rules changes that I want to see until spent rods are removed to Yucca Mountain are to stricter rules.

CL-25/3 Utility deregulation has put the ownership of these plants in hands that are not as responsible as they once were. Plymouth MA suffers financially because of the loss of tax revenue from the Pilgrim Plant - we cannot assume the

CL-25/4 additional risk these rules would place on us. Until the spent rods are removed from local nuclear power plants the decommissioning rules should be tightened, not loosened. Your proposal may have seemed reasonable earlier this year but we live in a very different world now It can no longer be business as usual at the NRC

CL-25/5 Many key issues that local communities face as reactors close and owners leave (liability-free) will be unchallengeable, because they are being listed

CL-25/6 as "generic" issues. I support the designation of environmental justice and endangered species issues as site-specific (not generic) and designation of Rubblization as site-specific.

CL-25/7 The proposed rules ignore radiation dangers after decommissioning The NRC

CL-25/8

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTN2)

CL-25/9 must incorporate offsite contamination in all evaluations of environmental impacts. The National Environmental Policy Act was written for a purpose, your proposed rules side step that purpose.

CL-25/10 You must not remove license amendment requirements when changing from an operating license to a nuclear materials possession-only license. I stand

CL-25/11 firmly against the "release" of contaminated materials into daily consumer contact and commerce or unregulated disposal.

CL-25/12 Deregulation has already had serious negative impact on local municipalities this will be just another blow

Sincerely,

Edward T. Russell

Letter 26, page 1

11/9/01

66 FR 56721

26

From: Dave Matthews <david matthews@sun.com>
To: <dgeis@nrc.gov>
Date: 1/21/02 10.52AM
Subject: Decommissioning Nuclear Power Reactors EIS Supp1

Dear Sirs,
I am writing to comment on the EIS supplement 1.

CL-26/1 In general, I am strongly opposed to the attempts to designate many issues as generic instead of site specific and thus to remove these issues form public review and comment.

CL-26/2 Specifically , I am opposed to the following proposals in the EIS:

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

CL-26/3 NRC allows portions of sites to be "released" from regulatory control before the whole site it released.

CL-26/4 NRC opens up two "entombment" options.

CL-26/5 NRC ignores radiation dangers after decommissioning is done and utility is relieved of liability.

CL-26/6 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.

CL-26/7-9 NRC ignores radiation offsite and permits utilities to ignore it in decommissioning planning. I ask that the NRC incorporate offsite contamination into all evaluations of environmental impacts.

CL-26/10 NRC prevents the National Environmental Policy Act from applying to most of the decommissioning process.

CL-26/11 NRC redefines terms to avoid local, site specific opportunity to question, challenge and prevent unsafe decommissioning decisions.

CL-26/12 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.

CL-26/13 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 opportunity for public challenge or adjudicatory processes)

CL-26/14 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.

Template=ADM-013

E-RIDS=ADM-03
Add=M. Masnik (MTM2)

Letter 26, page 2

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..."

CL-26/15 I stand firmly against the "release" of radioactively contaminated materials into daily consumer use and commerce or unregulated disposal.

Thank you
David Matthews

11/9/01
66 FR 56721
27

From: "Klaus Schumann" <jayklaus@email msn com>
To: <dgeis@nrc.gov>
Date: 1/21/02 12 52PM
Subject: comment to nureg 5086

Dear NRC,

CL-27/1 I do not support any attempt of your agency to narrow the scope of site-specific issues by declaring them to be generic.

CL-27/2 While the 9/11 events may call for some more secrecy, in most cases it's a matter of "closing the gates long after the horses are gone". Instead you should adopt a policy of allowing more public participation to ensure public confidence in your process!

CL-27/3 Re 9/11: I direct you to a quote from a recently published German report concerning the vulnerability of the Castor containers to terrorism: "the fact that all the technical data used in the report can ve accessed by terrorists does not imply that a more restrictive policy towards information is required. Rather, it should be regarded as an argument against the use of a technology which is, at the time, hazardous and complex to a large degree, creating a conflict between the necessary societal discussion on the one hand and the protection of society from terrorist attacks on the other." Compare: www bund.net/themen/energgiepolitik/StudieCASTORTerror rtf If we eliminate the necessary public discussion the terrorists will have won!

KLaus Schumann

Template = ADM-013

E-RIDS = ADM-03
Add = M. Hasdik (MTM2)

Letter 28, page 1

11/9/01
66FR56721
28

From: Dennis Larson <larsondf@yahoo.com>
To: <dgeis@nrc.gov>
Date: 1/21/02 1:36PM
Subject: reactor decommissioning

Re: decommissioning nuclear reactors

CL-28/1 Issues common to the process of decommissioning nuclear reactors should be raised with every reactor being decommissioned, not excluded from every specific reactor being decommissioned.

These common issues have not been resolved.

Dennis Larson

Do You Yahoo!?
Send FREE video emails in Yahoo! Mail!
http://promo.yahoo.com/videomail/

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTH2)

11/9/01
66FR56821
(29)

From: <Tifkel@aol com>
To: <dgeis@nrc.gov>
Date: 1/21/02 7.32PM
Subject: Decommissioning

Dear Mr. Geis:

CL-29/1
CL-29/2
CL-29/3

There are still radioactive dangers after decommissioning. I oppose the concept of rubblization as it is very dangerous; I oppose the release of radioactive contaminated materials into daily consumer or commercial uses. That is an idea that is insanely dangerous. Would you eat off a fork that contains radioactive mataerial? Why would anyone?

Sincerely,

Martin Kellerman

Template = ADM-013

E-RIDS = ADM-03
Add. = M. Masnik (MTM2)

YANKEE ATOMIC ELECTRIC COMPANY
19 Midstate Drive, Auburn, Massachusetts 01501

CONNECTICUT YANKEE ATOMIC POWER COMPANY
362 Injun Hollow Road, East Hampton, Connecticut 06424-3099

December 26, 2001

BYR 2001-084
CY-01-199

11/9/01
66 FR 56721

30

Chief, Rules and Directives branch
Division of Administrative Services
Mailstop T 6 D 59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Haddam Neck and Yankee Rowe Plant
Comments on Draft Supplement to GEIS

Yankee Atomic Electric Company (YAEC) and Connecticut Yankee Atomic Power Company (CYAPCO) appreciate the opportunity to provide comments on the draft supplement 1 to NUREG-0586, "Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities".

In a letter dated April 25, 2001[1], CYAPCO submitted a response to a Nuclear Regulatory Commission (NRC) request for additional information to support development of the Generic Environmental Impact Statement (GEIS) supplement. Many of these comments were incorporated in the draft
CL-30/1 supplement. In general the draft supplement meets the goal of updating the GEIS to current decommissioning practices and dismantlement options. We have reviewed the draft supplement and offer specific comments contained in the attachment.

If you have any questions regarding this submittal, please contact Gerry van Noordennen at (860) 267-3938.

[1] CYAPCO letter CY-01-076 to U.S. Nuclear Regulatory Commission, "Response to NRC Request for Additional Information to Support GEIS Supplement", dated April 25, 2001.

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

Sincerely,

for KJ Heider

Kenneth J. Heider
Vice President of Operations & Decommissioning

cc. H. J. Miller, NRC Region I Administrator
J. E. Donoghue, Senior Project Manager, Haddam Neck Plant
R. R. Bellamy, Chief, Decommissioning and Laboratory Branch, NRC Region I
Document Control Desk, U.S. Nuclear Regulatory Commission
D. C. Scalletti, U.S. Nuclear Regulatory Commission
Paul H. Genoa, Nuclear Energy Institute
E. L. Wilds, Jr., Director, CT DEP Monitoring and Radiation Division

U. S. Nuclear Regulatory Commission
BYR 2001-084/CY-01-199 / Attachment 1 Page 1

YAEC & CYAPCO Comments on the draft supplement to the GEIS

CL-30/2 1. The Figure 1-1, "Decommissioning Timeline" should also reflect the 60 year window, mentioned in 10CFR50.82(a)(3), that starts from the permanent cessation of operation.

CL-30/3 2. Revise the first part of the last sentence on page 1-5 to read:

> If a licensee chose to operate the ISFSI under a Part 50 license, they could choose to continue under the Part 50 license, or by way of license amendment request, ...

CL-30/4 3. Delete the discussion of "Rubblization" on page 1-7 and delete the term "Rubblization" in the Glossary (Appendix M). Maine Yankee first utilized this term in a January 13, 2000 letter which served to submit their License Termination Plan (LTP). On June 1, 2001, Maine Yankee filed revision 1 to their LTP. On August 13, 2001, Maine Yankee filed revision 2 to their LTP. In their current LTP, Maine Yankee does not propose to use "Rubblization" and no longer utilizes the term. No licensee is currently pursuing the "Rubblization" concept as described in Maine Yankee's original LTP submittal.

The term which most accurately describes the approach which licensees are currently pursuing is "concrete backfill". Connecticut Yankee described the process as follows in section 4.3.1 of our LTP submitted on July 7, 2000:

> Concrete from contaminated structures will be remediated to a level meeting the radiological criteria for unrestricted release of the site. After completion of final status surveys and absent any findings during NRC inspections, concrete building debris from decontaminated structures may be used as backfill and placed into the remaining subsurface building foundations.

CL-30/5 4. Under the description of the Turbine building (on page 3-6) revise the last two sentences to read:

> Primary coolant is not circulated through the turbine building systems in PWRs. However, it is not unusual for the turbine building to become mildly contaminated during power generation at PWRs.

CL-30/6 5. Add the following sentence to the first paragraph in section 3.1.4:

> Most of the contamination in the reactor coolant system is from the activation of corrosion products and not fuel.

U. S. Nuclear Regulatory Commission
BYR 2001-084/CY-01-199 / Attachment 1 Page 2

CL-30/7 6. Revise the second to last sentence on page 3-15 to read:

> The entire structure (or portions) must be removed.....

CL-30/8 7. The last sentence on page 3-15 is only true if corrosion products are included. The sentence should be revised to read:

> If corrosion products are included, the radioactive decay.....

CL-30/9 8. The last two paragraphs on page 3-15 need to be rewritten. The discussion of contamination and activation needs to be clarified. If requested, CYAPCO will work with the Commission to rewrite this text.

CL-30/10 9. Yankee Rowe should be added to the list of plants mentioned in the second to last paragraph of page 3-26. The Yankee Nuclear Power Station was one of the plants in the AEC's Demonstration's Program. Yankee Rowe's license number is DPR-3.

CL-30/11 10. The second to last paragraph on page 3-32 discusses the creation of nuclear islands. Nuclear islands are not primarily created because of security reasons. The real benefit in creating nuclear islands is to not interfere with spent fuel storage. The purpose for creating a nuclear island is to provide a facility for the safe long-term storage of spent fuel, which is independent of the remainder or the rest of the facility. The purpose of the modifications is to divorce the spent fuel cooling function from dependence on systems which must be dismantled as part of the overall decommissioning process.

CL-30/12 11. Expand the discussion about Stage 4 of the decommissioning process. This discussion should contain as much description as the descriptions under stages 1 through 3.

CL-30/13 12. Delete "groundwater" from the first sentence in section 4.3.3.4. Releases are not made to groundwater under NPDES permits. NPDES discharge points discharge to surface water locations.

Exelon Nuclear

Exelon Nuclear
200 Exelon Way
Kennett Square, PA 19348

www.exeloncorp.com

11/9/01
66 FR 56721
(31)

December 28, 2001

Secretary
U.S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

Subject: Comments Concerning Draft Supplement 1 to NUREG-0586, "Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities" (66FR56712, dated November 9, 2001)

Dear Sir or Madam:

This letter is being submitted in response to the NRC's request for comments concerning Draft Supplement 1 to NUREG-0586, "Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities" which was published in the Federal Register (i.e., 66FR56712, dated November 9, 2001). The NRC is proposing that this Supplement updates information in the existing 1988 GEIS relating to pressurized water reactors, boiling water reactors, and multiple reactor stations. Additionally, this Supplement goes beyond the 1988 GEIS by considering high-temperature gas-cooled reactors and fast breeder reactors. The NRC's intent is that this Supplement be used to consider, in a comprehensive and generic manner to the extent practicable, the environmental impacts of radiological decommissioning of nuclear reactor facilities by incorporating updated information, regulations, and analyses.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment. Generic and specific comments follow in Attachments 1 and 2, respectively. If you have any questions, please do not hesitate to contact us.

Very truly yours,

for

Michael P. Gallagher
Director, Licensing and Regulatory Affairs
Mid-Atlantic Regional Operating Group

Attachments

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

ATTACHMENT 1
Generic Comments on NUREG-0586 Draft Supplement 1

CL-31/1 1. Exelon believes the proposed Draft Supplement correctly concludes that most of the environmental issues assessed result in impacts that are generic and SMALL for all plants. We reach this conclusion based upon our experience decommissioning one BWR (Dresden 1), two PWR's (Zion Station), one HTGR (Peach Bottom 1), and our observation of other industry decommissioning projects We have not seen to date – and currently do not expect to find – environmental impacts different from those addressed and bounded by this Supplement to the GEIS.

CL-31/2 2. Exelon continues to maintain that providing guidance, which addresses environmental issues generically, provides the highest standard the public at large can use effectively to challenge industry to return power plant sites to beneficial use upon facility retirement.

CL-31/3 3. The Supplement properly addresses the ENTOMB decommissioning option Issues related to the ENTOMB option after the facility has terminated its NRC license and entered the entombment period are outside the scope of this GEIS. Power reactor entombment is not construction of a LLW disposal facility – it is properly classified as a decommissioning scenario, which creates an assured storage facility for radioactive material to decay in place, until it no longer represents a hazard considering future public use of the site. The clear distinction between entombment as a decommissioning scenario and a LLW disposal facility may be found in the ability to reuse the site in the future for other purposes. Regulation governing LLW disposal facilities does not contemplate future use of the site, restricted or unrestricted. Future use of an entombed site will be dictated by the dose-based performance criteria found in 10 CFR Part 20, Subpart E.

CL-31/4 4. The Supplement improperly addresses rubblization by stating it will require a site-specific analysis at the time the license termination plan is submitted Rubblization should be addressed generically as a part of the decommissioning process. The NRC should continue to maintain that to the extent that 10 CFR Part 20, Subpart E dose performance criteria are met – and that decommissioning has been performed using the ALARA principal, rubblization has a SMALL environmental impact.

CL-31/5 5. The Supplement incorrectly addresses the impact on the SAFSTOR scenario due to the time gap between cessation of operations and decommissioning activities. The Supplement expects the time gap will result in a shortage of personnel familiar with the facility when decommissioning activities commence. Our own experiences have shown us that both DECON and SAFSTOR decommissioning scenarios can be conducted in a safe and efficient manner. Regarding the familiarity of the facility at the end of licensed life, whether the plant begins decommissioning immediately or waits for some defined period – the most difficult aspect is retrieving records from the earliest days of operation. Recently retired facilities have taken the appropriate step of preparing a site historical assessment – documenting the operating years of the facility. This historical assessment will guide the decommissioning process whether it begins immediately upon retirement or 50 years later.

ATTACHMENT 2
Specific Comments on NUREG-0586 Draft Supplement 1

CL-31/6 1. On Pg 3-17 there is a discussion of the advantages of the DECON alternative for decommissioning. One advantage of DECON is not discussed and should be Generally speaking the shorted lived nuclides are easier to detect because of their beta/gamma emissions, versus the alpha emissions of longer lived nuclides. The difficulty of detecting the alpha emitters will increase analysis costs and increase the difficulty of performing surveys. Ultimately the cost of providing RP coverage and of performing the Site Characterization and Final Status Survey will also be increased.

CL-31/7 2. On Pg 3-19 the discussion of the SAFESTOR option assumes that there is a savings associated with less Solid RW disposal costs. However they do not consider that the current NRC guidance for release of material includes a no detectable criteria. In order for the reduction of Solid RW to be achieved, significant quantities of plant matenals would need to be released from the site. The current regulations do not support this assumption.

CL-31/8 3 On Pg 4-9 the NUREG concludes (Sec 4 3 2.4) that the environmental impact of water usage will be small. In the evaluation they consider the anticipated reduction in water usage for cooling in the condenser. This conclusion appears reasonable, however the analysis should also consider the environmental effects of the loss of heat provided by cooling water discharged to a closed lake or pond system that is a habitat for aquatic animals and vegetation. Many nuclear facilities are on natural or man-made bodies of water making this environmental effect generic in nature.

CL-31/9 4 On Pg 4-16 the NUREG concludes (Sec 4.3 4 4) the environmental impact of air emissions will be small In the evaluation they did not consider that many sites use extraction steam to provide plant heat in the winter months The shutdown of the reactor means that Aux Boilers will be operated for longer periods to provide heating steam. This needs to be considered in the NUREG or many facilities will need to address this issue in their PSDAR

CL-31/10 5 On Pg 4 –29 the NUREG (section 4.3 8.3) concludes that it is not necessary to update estimates for collective dose due to decommissioning activities. This is an important conclusion that is supported by the current range in collective dose that decommissioning plants have experienced. Any change to this conclusion needs to be well supported by actual data and needs to be thoroughly studied to identify all potential impacts.

CL-31/11 6 Table 4 –1 on page 4 –30 is misleading The totals given include 100 rem of transportation dose that is not tracked by the facility undergoing decommissioning. It also does not include dose incurred during construction of a Spent Fuel Pool Island or in support of a dry cask storage campaign. A footnote should be added explaining these differences

CL-31/12 7. Table 4-3 lists the decommissioning cost of Peach Bottom Unit 1 to be 54 million dollars (in January 2001 dollars) In our letter submitted on March 30, 2001, in accordance with 10CFR50.75 the decommissioning cost estimate for Peach Bottom Unit 1 reported in beginning of year 2001 dollars is 65 4 million dollars Table 4-3 should be changed to reflect the latest cost estimate.

CL-31/13 8. Table 4-4 lists the decommissioning cost of the high-temperature gas-cooled reactor in SAFSTOR (Peach Bottom Unit 1) to be 54 million dollars (in January 2001 dollars). In our letter submitted on March 30, 2001, in accordance with 10CFR50.75 the decommissioning cost estimate for Peach Bottom, Unit 1 reported in beginning of year 2001 dollars is 65 4 million dollars. Table 4-4 should be changed to reflect the latest cost estimate.

CL-31/14 9. Table F-1 lists the total site area for Peach Bottom Unit 1 to be 620 acres. 620 acres is the total site area reported in the Peach Bottom Unit 2 and 3 Updated Final Safety Analysis Report However, Table F-2 reports the total site area for Peach Bottom Units 2 and 3 to be 618 acres. Table F-2 should be changed to reflect the total site area for Peach Bottom Units 2 and 3 to be 620 acres.

CL-31/15 10 Table I-3 incorrectly lists site flooding as the only accident analyzed for Peach Bottom Unit 1 in the documents referenced in Appendix I for Peach Bottom Unit 1. The additional accidents analyzed for Peach Bottom Unit 1 that should be added to Table I-3 are:

- Release of helium coolant under containment breach (open penetration to containment) for accidents involving radioactive materials (non-fuel–related) on page I-9
- Fire inside reactor vessel under fire for accidents involving radioactive materials (non-fuel –related) on page I-10.

CL-31/16 11. On page L-6 of Appendix L, line 4 refers to criticality accident monitoring requirements described in 10CFR7.24 Criticality accident monitoring requirements are described in 10CFR70 24. This typographical error should be corrected.

CL-31/17 12. On page L-6 of Appendix L, line 17 refers to 10CFR50 73 as requiring a licensee event report within 30 days 10CFR50 73 was recently revised to require a licensee event report within 60 days This change should be made to Appendix L.

CL-31/18 13 While the Supplement addresses two entombment options stating they have prepared as extreme cases to envelop a wide range of potential options, there should be additional language early in Section 3 2.3 ENTOMB clarifying that utilities are likely to develop entombment scenarios based upon their site specific needs.

CL-31/19 14. All spent fuel at Dresden Unit 1 will be moved to dry storage on site by the end of the first quarter of 2002. This change needs to be reflected in Table 3-2.

11/9/01
66FR56721
32

From: <GEORGNBAY@aol.com>
To: <dgeis@nrc.gov>
Date: 1/24/02 9.17AM
Subject: relaxing standards

Dear Sir/Madame,

CL-32/1 I urge you to stop any further relaxing of nuclear power reactor decommissioning requirements. Enough is enough. The suggestions you are making toward relaxing further standards will create massive public health and economic problems. Just one example is letting the concrete reactors erode naturally which is extremely unsafe. And to ignore radation concerns to the unsuspecting public health is criminal.
CL-32/2
CL-32/3
It is out rageous to allow the reactors to be liability-free. That is like saying to the consumer " Your money AND your life". We have paid and paid for nuclear power and we all know it is the biggest welfare mother of all time.

Yours in concern

Susan Clark

Template=ADM-013

E-RIDS=ADM-03
Add= M. Masnik (MTHR)

From: Margaret Nagel <formargaretn@earthlink net>
To: <dgeis@nrc.gov>
Date: 1/24/02 1 51PM
Subject: Weakening Requirements for Decommissioning US Nuclear PowerReactors

11/9/01
66FR56721
33

From·

Margaret Nagel
631 Hinman Ave
Evanston, IL 60202-2514

To·

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

January 24, 2002

CL-33/1 In setting requirements for decommissioning US nuclear power reactors, please bear in mind other things besides the needs of Richard (Enron) Cheney, Halliburton Inc., Brown & Root, and other powers that be. Long after these miserable "powers" have crumbled away, your children and grandchildren

CL-33/2 and mine, and their descendants, will have to live in this world. The nuclear power industry was a colossal mistake to begin with, as we all know.

CL-33/3 Most of us also realize that the immune systems of every living thing on this planet -- human systems included -- are becoming intolerably stressed by mounting (and synergisticaly interacting) levels of pollution of all

CL-33/4 sorts. To add to these levels by deliberately ignoring the dangers of radiation exposure is wantonly criminal. Those who do so will go down in history as villains of the worst sort: smug, obtuse, shrivel-hearted, deceiving, opportunistic, self-serving, cowardly, corrupt people who really

CL-33/5 ought to know better. I fail to see any moral difference between terrorists who fly planes into buildings, and bureacrats who are perfectly willing to

CL-33/6 expose whole populations to additional dangers from radiation. In the name of humanity and morality, you should all leave your jobs now in righteous protest at what you're being asked to do. Walk out. Say goodbye. Go work at Wal-Mart if you have to But don't recklessly endanger the health of this nation by acquiescing in these evil plans

I utterly oppose·

CL-33/7 1. "rubblization" with no opportunities for meaningful public intervention ahead of time

CL-33/8 2 allowing portions of sites to be released from regulatory control before the whole site is released.

CL-33/9 3 ignoring readiation dangers after decommissioning is done and utility is relieved of liability.

CL-33/10 4 ignoring radiation exposures to children and other vulnerable members of the population and creating a fictitious highest exposed "critical group" based on unsubstantiated assumptions.

Template = ADM-013

E-RIDS = ADM-03
Add = M. Mossik (MTM 2)

CL-33/11 5. ignoring offsite radiation and permitting utilities to ignore it in
CL-33/12 decommission planning NRC should incorporate offsite contamination into all evaluations of environmental impacts

I also utterly oppose:

CL-33/13 1. Preventing the National Environmental Policy Act from applying to most of the decommissioning process.

CL-33/14 2. Making most aspects of decommissioning "generic" rather than site-specific, so they cannot be legally reviewed or challenged at individual sites

CL-33/15 3. Redefining terms to avoid local, site-specific opportunity to question, challenge, and prevent unsafe decommissioning decisions.

CL-33/16 4 setting "low, medium, and high" environmental impact categories for each of the steps in decommissioning, to give the appearance that some things have negligible effects that don't warrant further consideration.

CL-33/17 5. removing the requirement for a license amendment when changing from a nuclear power operating license to a nuclear materials possession-only license, thereby eliminating the opportunity for public challenge or adjudicatory processes.

CL-33/18 6. attempting to legally justify the removal of the existing opportunities for community involvement and for legal public intervention until activities such as flushing, cutting, hauling and possibly rubblizing of the reactor are complete -- in other words, until the damage has irretrievably been done.

CL-33/19 7. stating that 10 CFR 20 section E and its Environmental Impact Statement, NUREG 1496, are not part of the scope of this Supplement.

CL-33/20 8 defining decommissioning, in part, to include the "release of property for unrestricted use" and the "release of property under restricted conditions" -- in other words, releasing radioactively contaminated materials into daily consumer use and commerce and unregulated disposal How can you contemplate such a thing!!!!!!!!!!!!!!

Sincerely,

Margaret Nagel

CC: Margaret Nagel <formargaretn@earthlink.net>, "Richard J Durbin" <dick@durbin senate gov>, "Peter G Fitzgerald" <senator_fitzgerald@fitzgerald senate gov>

Letter 34, page 1

Dons Mendiola - NUCLEAR POWER PLANTS Page 1

11/9/01
66FR56742
(34)

From: "Liane Casten" <lcasten@interaccess.com>
To: <dgeis@nrc.gov>
Date: 1/24/02 3.40PM
Subject: NUCLEAR POWER PLANTS

CL-34/1 To even think that decommissioning nuclear power plants' regulations via presidential fiat is acceptable is beyond logic and reason.
CL-34/2 You are insuring the further deterioration of health for innocent civilians and this planet.
CL-34/3 Bush is stripping us all of those safeguards we all need to protect citizens--and this includes you. He has
CL-34/4 only corporate interests--the nuclear power industry being one. To enforce no liabilty after they leave is
CL-34/5 simply criminal. You do not need to further endanger our lives while the polluters go scott free..
Enough.
Liane Casten

Template=ADM-03

E-RIDS=ADM-03
Add=M. Masnik (MTM2)

11/9/01
66 FR 56721
35

From: <little lamb@att net>
To: <dgeis@nrc.gov>
Date: 1/25/02 1 00PM
Subject: Public Comment=Shame on you!

Public Comment re: the U.S. Nuclear Regulatory Commission's (NRC) draft Decommissioning Nuclear Power Reactors Environmental Impact Statement Supplement 1.

Dear Nuclear Regulatory Commission,

CL-35/1 Please increase, rather than decrease, public participation in every single aspect of the planning, building, and running of Nuclear Power Plants. Please do this even if you don't want to.

The public, to you, may seem like a thorn in your side, something that gets in the way of your plans. But a democratic government should not seek to shut their people out of decisions that effect their lives. It is a very sad reflection on the state of our democracy that this seems to be precisely the aim of your draft regulations. -Don't you believe in democracy? Are you tired of playing by democratic rules if it means you can't win each and every time? Is democracy too inconvenient for you?

If you were busy doing the "right thing" you would be excited and proud to open your process to the public. If you were involved in an honest process, you would be eager to engage your opponents in debate about it. You would not have to stack the deck, hide your process, shut the people out. Shame on you! See if you have the courage to do the right thing! --- And have the courtesy not to send one of those dummy automatic replies!

Mary Kim
116 Pinehurst Avenue #C3
New York City 10033

212.923.7800 x 1303

RECEIVED
2002 JAN 25 PM 5:41
Rules and Directives Branch
USNRC

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

11/9/01
66 FR 56721
36

From: Donald Miller <d.w miller@csuohio.edu>
To: <dgeis@nrc gov>
Date: 1/25/02 5.56PM
Subject: NRC's supplement to NUREG-0586, re decommissioning

I have some questions.

CL-36/1 Why, in this same democracy that we hold up so proudly to the world, does the NRC seek to prevent public comment on the basic issue of public health in a nuclear world?

CL-36/2 If the NRC is confident--as its supplementary changes to NUREG-0586 suggest-- that onsite and offsite radioactive contamination during decommissioning and afterward will be minimal, why does it seek to remove all liability from the owner even before the process is complete? (If the NRC is wrong, who will pay?)

CL-36/3 It is my understanding that the purpose, and certainly the effect, of the proposed supplement to NUREG-0586 is to reclassify many decommissioning issues as "generic" in order to avoid a community's right of challenge and to allow owners to depart without liability. I understand that the NRC supplement seriously limits a community's ability to challenge even those issues that are considered "site-specific".

The designation of environmental justice issues and endangered species issues must remain viable SITE-SPECIFIC matters for public debate and legal challenge, as must the hazardous technology (I think of the continuing, poisonous twin-towers fallout) of rubblization.

CL-36/4 The NRC must retain regulatory control of the entire site. The NRC must require a LICENSE AMENDMENT when an owner is granted a change from an operating license to a materials-possession-only license.

CL-36/5 The owner must remain fully liable.

CL-36/6 The NRC must address the subject of radiation dangers after decommissioning HONESTLY, USING THE BEST INDEPENDENT RESEARCH, including
--exposure of children
--exposure of the weak, the ill, the elderly
--offsite contamination
--credible, not arbitrary, environmental impact categories
FOR EACH STEP OF A DECOMMISSIONING.

CL-36/7 The NRC must NOT permit "release of property for unrestricted use" or under "restricted conditions" To permit the release of radioactively contaminated materials into daily consumer use and commerce, or to allow unregulated disposal of such materials is abhorrent. Bin Laden might approve of such an interesting experiment; I trust that the NRC does not and will not.

CL-36/8 The NRC must resist the pressure of the nuclear industry If their profits are waning, they have had their turn. The citizens of the U.S., who pay everyone's way, have a right to expect a healthy environment, and a right to fight for it within the U S. legal system. (But what a shame that a fight is ever needed)

Sincerely yours,

Template = ADM-013

E-RIDS = ADM-03
Add = M. Hasnik (MTH2)

Suzanne Miller
3142 Yorkshire Road
Cleveland Hts , Ohio 44118

From: "James Nordlund" <reality@pld com>
To: <dgeis@nrc gov>
Date: 1/26/02 7:32PM
Subject: Comments on the N R C draft, please add them :)

11/9/01
66 FR 56721
37

CL-37/1 Hello! As NIRS, I stand firmly against the "release" of radioactively contaminated materials into daily consumer use and commerce or unregulated disposal.

I hope you'll give these matters the serious attention they warrant. Viva la evolution, viva green party! reality Thanx for your attention, time, and efforts!

Matutinally Yours,

Name = james m nordlund

Preferred E-Mail Address = reality@pld com

Additional E-Mail Address = jamesmnordlund@yahoo.com

Web Site URL = www everythingforeveryone org

Home Address = p o.b. 982, lakin, KS 67860-0982

Work Address = s a a.

Send Correspondence = Home

Home Telephone = [redacted]

Work Telephone = 209-844-3835

Fax = 209-844-3835

Work Sector = nonprofit, human services

Professional Field = psychology

Professional Field (others) = evolution

Specialization = mental health counseling

Template=ADM-013

E-RIDS= ADM-03
Add= M. Masnik (MTH2)
Home phone number removed per Mike Lesar.

Letter 38, page 1

Doris | ıla - Mail | Page 1

From: Roger Voelker <regor@scblackmedia com>
To: <dgeis@nrc gov>
Date: 1/27/02 8 01PM

11/9/01
66 FR 56721
38

Chief, Rules and Directives Branch
Division of Administrative Services
US Nuclear Regulatory Commission
Washington, DC 20555-0001

To Whom it May Concern:

The following constitutes my comments on NUREG¡V0586 Draft Supplement 1 Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities--Draft Supplement Dealing with Decommissioning of Nuclear Power Reactors:

Several years ago I attended a meeting between representatives of several investor-owned electric utility companies that were attempting to work out a common position on utility deregulation for the state of Indiana.

At one point in the discussion a representative of American Electric Power, owner of the D.C Cook Nuclear Plant, made a most revealing statement. Concerned that nuclear power could not compete with other forms of electric generation, the AEP representative pointed out that, following decommissioning, they could not just come in with a wrecking ball, knock the plant down and haul the rubble off to the nearest landfill. Instead, he said, the closed plant would have to be indefinitely isolated from the environment. His exact words (delivered with great emphasis) were ¡§that means fences, guards and guard dogs FOREVER!¡□

CL-38/1 Now, with Supplement I to NUREG¡V0586, the NRC would appear to be paving the way for the very rubblization and possible release into the environment of ¡§slightly contaminated¡□ material that the AEP rep said could not happen.

The vehicle to allow this would appear to be the declaration of more decommissioning issues ¡§Generic¡□ rather than ¡§Site-Specific,¡□ thus preempting the right of local residents to raise concerns during the License Termination Plan review.

CL-38/2 Some of my concerns about NUREG¡V0586 include.

„h the use of generic proceedings to eliminate site-specific evaluation of concerns;

CL-38/3 „h the generic approval of rubblization of reactor buildings and leaving them on site,

CL-38/4 „h the vague and arbitrary use of ¡§Small, Moderate, and Large¡□ significance levels and the intent for use of these designations, which echoes previous attempted bogus designations such as ¡§below regulatory concern¡□;

CL-38/5 „h the extent to which radioactive contamination levels that are permitted to be ¡§released¡□ from regulatory control for decommissioning would result in the release of radioactive materials routinely;

CL-38/6 The draft GEIS says that ¡§low-level¡□ radioactive waste disposal is not part of the scope of this GEIS. However, this would appear to be contradicted by the definition of decommissioning (pg. xii), and by the scope, the release and removal of Sites, Systems and Components (SSCs).

CL-38/7 I specifically oppose any release of contaminated materials during decommissioning or other times/ procedures.

Template - ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

Letter 38, page2

Doris | ıla - Mail | Page 2

Roger Voelker
5849 E North St.,
Tucson, AZ 85712

Sign up for FREE email from SCBLACKMEDIA.com at http://www.scblackmedia.com

11/9/01
66 FR 56721
39

From: "Anne and Tom Moore" <c3moore@hotmail com>
To: <dgeis@nrc gov>
Date: 1/28/02 7:41AM
Subject: NUREG-0586

Chief, Rules and Directives Branch,

CL-39/1 I find the proposals in Supplement 1 to the Generic Environmental Impact Statement on Decommissioning unrealistic when it comes to the health of U.S. citizens at the time of decommissioning and to those living years later.

CL-39/2 To catergonze as "generic" "the release" from regulatory control

CL-39/3 portions of sites before they are completely decommissioned is not responsible. No radioactivity cotaminated parts should be allowed into consumer use, commerce, or unregulated disposal

CL-39/4 To allow utilities to have no liability after decommissioning is done when the proposals are seen as "generic" does not provide any protection to local citizens. Accountibility for our actions is important and utility companies should not be exempt from that.

CL-39/5 There should be a requirement for a license amendment when a utility changes from being a nuclear power operating license to a nuclear materials possession-only license.

CL-39/6 I know that I am not alone in asking you to protect our citizens from radioactivity on such a large scale and hope that you will live up to your responsibility by not lessening the requiremets that utility companies face when decommissioning takes place.

Sincerely,

Anne H. T. Moore

Join the world's largest e-mail service with MSN Hotmail.
http://www hotmail com

Template-ADM-013 E-RIDS=ADM-03
Add=M. Masnik (MTM2)

11/9/01
66 FR 56721
(40)

From: "john runkle" <jrunkle@mindspring.com>
To: <dgeis@nrc gov>
Date: 1/28/02 1:11PM
Subject: Decommissioning Nuclear Power Reactors EIS Supplement 1

VIA EMAIL & Mail

1/29/02

From: Conservation Council of North Carolina, Post Office Box 12671, Raleigh, North Carolina 27605; telephone: 919-839-0006

To: Chief, Rules Directives Branch; Division of Administrative Services,Mailstop T 6 D 59; U.S. Nuclear Regulatory Commission; Washington D.C. 20555-0001

Re: Draft Decommissioning Nuclear Power Reactors EIS Supplement 1 (Supplement to NUREG-0586)

Dear Sir:

The Conservation Council of North Carolina is a statewide environmental organization with a long history of involvement in nuclear plant licensing, waste storage and decommissioning. We offer the following comments on the NRC's Draft Decommissioning Nuclear Power Reactors EIS Supplement 1:

CL-40/1 1. We are deeply concerned about the NRC's proposal to treat almost all decommissioning issues in a generic EIS rather than in an individual EIS for each plant. As we have seen in many of the licensing proceedings, nuclear plants have a wide variety of dissimilarities, even with other plants owned by the same utility and constructed by the same companies. These differences are compounded when it comes to decommissioning as the different work plans for each plant may have considerably different impacts on workers on-site and the public off-site.

CL-40/2 2. All decommissioning activities need to consider the impacts of radiation exposure to workers and the public. Radiation exposures to children and other vulnerable members of the population should be separately and realistically addressed with all pathways to exposure closely examined. Assumptions about off-site exposure should be substantiated with full peer-review from neutral parties, i.e. not employees of the nuclear utilities. The risk to public health cannot be minimized or discounted.

CL-40/3 3. Decommissioning should never be deemed to be complete until the entire site is no longer radioactive. We understand that this means extremely long-term oversight of the reactor sites. Some of the decommissioning wastes, such as the nickel compounds, have extremely long half-lives and remain dangerous for millennia. Liability for the site needs to remain with the utilities and the NRC must retain regulatory control over the entire site.

CL-40/4 4. As we have previously commented in other dockets, there should be no release of radioactively contaminated material of any kind into consumer use or into general commerce. Disposal of all materials from decommissioning need to be regulated, regardless of whether they are radioactive or not.

Please notify me of any decision you make regarding this docket.

Sincerely,

John D. Runkle

General Counsel

Template = ADM-013

E-RIDS = ADM-03
Add = M. Hasnik (MTH2)

11/9/01
66 FR 56721
(41)

From: Benjamin Schlau <benitothecat@yahoo com>
To: <dgeis@nrc gov>
Date: 1/29/02 2 56PM
Subject: subtle deregulation

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

CL-41/1 It has come to my attention that the Nuclear Regulatory Commission is possibly compramising the security of our nations future by making way for further build up of nuclear waste that will theoreticly be safe in so many thousands of years

CL-41/2 I am opposed to any extensions on operating licenses for nuclear facilities of any sort and wish for a move to cleaner renewable energy.

Thank you.
U S. Voter
Benjamin Schlau
1163 Lazy Ln. Ct.
Mt. Pleasant, SC
29464

The Nuclear Regulatory Commission has already relaxed and is further
relaxing its decommissioning requirements for nuclear power reactors.
NRC is justifying these regulatory changes by "supplementing" the 1988
Generic Environmental Impact Statement on Decommissioning Nuclear
Facilities (NUREG-0586) with new, "updated" information on nuclear
power
reactor decommissioning If NRC succeeds, 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. NIRS supports the designation

Template = ADM-013

E-RIDS = ADM-03
Add = H. Masnik (NMSS)

of environmental
justice and endangered species issues as site-specific (not generic).
NIRS opposes Rubblization but supports its designation as
site-specific

Do You Yahoo!?
Great stuff seeking new owners in Yahoo! Auctions!
http://auctions yahoo com

Letter 42, page 1

11/9/01
66 FR 56721
(42)

From: Tom Ferguson <thinkspeak@earthlink.net>
To: <dgeis@nrc.gov>
Date. 1/29/02 4.13PM
Subject: comment (NRC) draft Decommissioning Nuclear Power Reactors EIS

CL-42/1 One of the important and obvious things to be said about decommissioning nuclear power plants is that it is expensive, potentially dangerous and nearly unprecedented. We appreciate that entombment is now being considered.

CL-42/2 It ought to be equally obvious that

1.Since a satisfactory waste isolation solution evades us (we do not agree with Secretary Abraham that Yucca Mountain is a suitable repository based on science – the DOE itself admits that the site is not geologically suitable and the GAO raises serious questions about the selection process).

CL-42/3 2.That a serious accident or terrorist act in this industry could be catastrophic, leaving immense fatalities, injuries, future cancer victims and vast areas uninhabitable for years

CL-42/4 3 That without public subsidy (via Price-Anderson) nuclear power is economically untenable

CL-42/5 4.Given these factors the complete phase-out of nuclear power should be a high priority Alternative power sources such as wind, solar, hydrogen fuel cell [and conservation] should be vigorously pursued in its stead

Tom Ferguson
Cyndia Hunnicutt
Kallio Hunnicutt-Ferguson
372 Oakland ave se
Atlanta, GA 30312

Template = ADM-013

E-RIDS = ADM-03
Add = M. Hasnik (MTM2)

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
(49)

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

CL-43/1 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

CL-43/2 NRC allows portions of sites to be "released" from regulatory control before the whole site it released

CL-43/3 NRC opens up two "entombment" options

CL-43/4 NRC ignores radiation dangers after decommissioning is done and utility is relieved of liability.

CL-43/5 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.

CL-43/6 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.

CL-43/7 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)

CL-43/8 NRC makes most aspects of decommissioning "generic" rather than site-specific, so they cannot be legally reviewed or challenged at individual sites.

CL-43/9 NRC redefines terms to avoid local, site specific opportunity to question, challenge and prevent unsafe decommissioning decisions

CL-43/10 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.

CL-43/11 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

Template = ADM-013

E-RIDS-ADM-03
add = M. Hasnik (MTM2)

opportunity for public challenge or adjudicatory processes)

CL-43/12 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.

CL-43/13 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

CL-43/14 NRC defines decommissioning, in part, to include the "release of property for unrestricted use.." and the "release of property under restricted conditions."

CL-43/15 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.

CL-43/16 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 mcnulty@mail house gov>

11/9/01
66FR56721
(44)

From: <Pdbsongs1@cs.com>
To: <dgeis@nrc.gov>
Date: 1/29/02 7.04PM
Subject: Comments-NRC Rules on Decommissioning - EIS Supplement I

D. Geis - NRC

I am forwarding Attachment (word document) letter to NRC, with my personal comments on proposed NRC Rules on Decommissioning.

Please confirm their receipt and acceptance by email.
Thank you in advance
Patricia Borchmann

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTH2)

FROM : BE GOOD FAX NO. : 7609419625 Jan. 30 2002 11:16AM P1

Patricia Borchmann
176 Walker Way
Vista, Ca 92083
(760) 941-9625

January 30, 2002

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

Email to: dgeis@nrc.gov

RE: U.S. Nuclear Regulatory Commission's Draft Decommissioning Nuclear Power Reactors E.I.S. Supplement 1

CL-44/1 I am very **strongly opposed** to the regulatory changes sought by NRC to further relax decommissioning requirements for nuclear power reactors, as proposed by the 1998 "Generic" E.I.S. on Decommissioning Nuclear Facilities (NUREG-0586), with new "updated" information on nuclear power reactor decommissioning. **The Proposed regulatory changes sought by N.R.C. are an insult to the public interest.**

CL-44/2 I also strongly opposed, and object to the proposed supplement to the "Generic" E.I.S., and the deliberate and inappropriate exclusion of "site specific" issues, which should be an imperative part of any analysis, for any form of an E.I.S. Supplement.

CL-44/3 "Site specific" issues are of vital importance, especially at San Onofre Nuclear Generating Station (SONGS) where Unit 1 is currently being decommissioned. It is imperative that N.R.C. evaluate and analyze SONGS Decommissioning on a "site specific" basis instead of a "Generic" basis, due to the very unique physical site characteristics at SONGS, which other existing nuclear plants in U.S. do not possess.

The distinctions, and physical characteristics which make conditions at SONGS so different and unique are vitally important, and are of utmost importance in any analysis of Decommissioning at SONGS, in order to ensure the level of public health and safety will be assured, and provided without compromise to citizens in communities surrounding SONGS. As SONGS Unit 1 is currently being Decommissioned, the site specific analysis must include both the short term and long term effects, and must also analyze effects of offsite contamination, effects of cumulative contamination and exposure, and must provide realistic mitigation measures..

A Summary of the "site specific" physical characteristics and conditions at SONGS, which should justify "site specific" analysis (as opposed to a Generic E.I.S. Supplement) include the following:

- SONGS is located in a highly populated area, with dense populations in both Orange County and San Diego County, where citizens may be exposed to potentially significant offsite effects.
- SONGS is located in a highly active seismic zone, where seismic activity is speculated by some geological experts to generate quakes up to 7 6 Magnitude on the Richter Scale (by new evidence of local off-shore blind thrust faults, which cause a greater extent of groundshaking and acceleration than the manner in which quakes are traditionally studied). SONGS was only designed and constructed to withstand a maximum quake of 7.0 Magnitude.
- SONGS is located in a area immediately on the southern California coastline, with most facilities elevated only to a level of 20' ft. above mean sea level. These facilities are highly exposed and vulnerable to effects of rising sea levels, and tsunamis, and are insufficiently protected.

CL-44/5 **I am opposed to NRC regulations pertaining to Decommissioning which would allow:**

- Rubbilization (crumbling the concrete reactor building) of nuclear reactors, without
- opportunity for public intervention until the action is completed.

CL-44/6
- Allows portions of sites to be "released" from regulatory control before the whole site is released.

CL-44/7
- Allows offsite radiation to be ignored, and permits utilities to ignore it in decommissioning planning. It is imperative to include offsite contamination into all aspects of decommissioning planning and evaluation of environmental impacts.

CL-44/8
- Allows NRC to make most aspects of decommissioning "generic" rather than site specific so NRC cannot be legally reviewed or challenged at individual sites.

CL-44/9
- Allows NRC to redefine terms to avoid local, site specific opportunity by public to question, challenge and prevent unsafe decommissioning decisions.

CL-44/10
- Allows NRC to set 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. This use of this piecemealing approach is unacceptable.

CL-44/11
- Would allow (with this supplement), NRC to legally justify removal of existing opportunities for community involvement and for legal public intervention until after the bulk of the decommissioning has been completed, including activities as flushing, cutting, hauling and possible rubbilization of reactor.

CL-44/12
- NRC asserts that the portion of decommissioning regulations (10 CFR 20 section E and its EIS, NUREG 1496) set the 25, 100 and 500 millirems per year allowable public dose levels from closed, decommissioned nuclear plants sites, and are not part of the scope of this Supplement. I disagree, and consider the inclusion of exposure from closed decommissioned plants a necessity to develop an accurate and realistic analysis of cumulative impacts.

CL-44/13
- Allows NRC to define decommissioning in part, to include "the release of property for unrestricted use" .. and the "release of property under restricted conditions." It is entirely inappropriate and scientifically ludicrous to allow "release" of highly radioactively contaminated materials into daily consumer use and commerce, or unregulated disposal, or the recycling of such materials into any form which causes public exposure with radioactively contaminated materials.

CL-44/14 In conclusion, it is with utmost disappointment to again observe with each and every new NRC Rulemaking, important components of the public's existing "right to know" and the public's right of active involvement in plant processes, decisions and their methodology, on all aspects of decommissioning activities routinely appears to be further diminished. As proposed, the EIS (Supplement I) would eliminate all opportunities for public intervention, and public oversight and/or intervention entirely with use of a "generic" EIS In such cases, the loss of public oversight and intervention on projects with a scope as large as decommissioning at SONGS, such losses may be unparalleled, or fully understood without a site specific issue analysis. **The citizens in local communities surrounding nuclear plants such as SONGS deserve this entitlement, and demand this entitlement.**

CL-44/15 The public has not only the "right to know", but NRC and the industry has the duty to fully disclose all related impacts, short and long term, on and offsite, direct and indirect, as well as cumulative effects resulting from decommissioning to citizens and members of the public living in local communities surrounding the nuclear plants.

CL-44/16 We are tired of being unknowingly treated as an entity from whom the industry can escape the obligation of full disclosure, and "used" as the entity upon whom the industry dumps the real long term costs, and as the entity who absorbs the costs.

Patricia Borchmann

CLEAN WATER ACTION ALLIANCE

11/09/01
66FR56721
(45)

January 30, 2002

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

To Whom It May Concern:

Pursuant to the Federal Register Notice of November 9, 2001 on the availability of the draft supplement to the Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities (NUREG-0586), Clean Water Action Alliance (CWAA) provides the following comments under the extended comment period ending January 30, 2002. CWAA is a citizen-based environmental organization with over 55,000 members throughout Minnesota. As a member of the Sustainable Energy for Economic Development (SEED) coalition and the Minnesotans for an Energy-Efficient Economy (ME3) Coalition, CWAA has worked for the transition away from coal and nuclear generation towards cleaner, non-polluting sources of energy for nearly ten years.

CL-45/1 CWAA supports the comments of NIRS, Public Citizen and the Critical Mass Energy Project. We concur with these organizations that changes in the supplement designed to limit citizen's opportunities to review or challenge decommissioning projects are undemocratic and ill advised. It is imprudent to reduce public oversight of these projects, no matter how much more convenient it seems. Environmental and health risks from improper decommissioning are very high, particularly to neighboring communities. Labeling certain issues 'generic' and making them unchallengeable is a disservice to those communities and citizens around the country who may be exposed to radioactive waste during the transport and disposal process.

CL-45/2

CL-45/3

Thanks you for your consideration.

Sincerely,

Diana S. McKeown

Diana S. McKeown
Energy Program Coordinator

template - ADM-013

E-RIDS = ADM-03
Add = H Hasnik (HTM2)

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CLEAN WATER ACTION

FAX COVER

To: Chief, Rules & Directives Branch Pages 2

From: Date 30 Jan 2002

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Notes

attn: Rules

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PHYSICIANS FOR SOCIAL RESPONSIBILITY / ATLANTA
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11/09/01
66 FR 56721
46

NRC
EMAIL: dgeis@nrc.gov
MAIL: Chief, Rules and Directives Branch/ Division of Administrative Services/ Mailstop T 6 D 59
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Ladies and Gentlemen:

CL-46/1
CL-46/2 In keeping with appropriate medical and public policy principles, we urge total transparency. We urge that the Commission always lead it's interactions with the public at large by being fully open and informative about the potential dangers, the expense and the limited experience we as a nation have with the decommissioning of nuclear reactors United States citizens deserve nothing less than total transparency.

We believe that the following statements are true and belong in the public dialogue, as the issues associated with decommissioning are presented to citizens·

CL-46/3 1. **A satisfactory waste isolation site evades us.** Yucca Mountain is not a suitable geologic repository based on science – the DOE itself admits that the site is not geologically suitable; storage canisters will be required to protect the waste from exterior environmental contamination. Additionally, the GAO raises serious questions about the selection process.

CL-46/4 2. **A serious accident or terrorist act could be catastrophic.** Such an occurrence could result in large numbers of human fatalities, injuries and illnesses and vast areas of land uninhabitable for years.

CL-46/5 3 **The enterprise of electricity generation using nuclear fission requires public subsidy.** Without Price-Anderson protection, nuclear power would be economically untenable.

CL-46/6 4. **Consideration of these factors must be fully and publicly discussed before exposing our citizens to additional exposures through development of new nuclear generation facilities.** The complete phase-out of nuclear power should be considered based on objective analysis of health and economic effects including probability evaluation of all possible accidents and incidents, and comparison of all potential energy sources such as wind, solar, hydrogen fuel cell and including conservation.

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Template = ADM-013 E-RIDS = ADM-03
Add = H. Hasnik (HTH2)

Letter 47, page 1

11/09/01
66 FR 56721
(47)

From: "Dave Ritter" <dritter@citizen.org>
To: <dgeis@nrc gov>
Date: 1/30/02 4.22PM
Subject: Decommissioning comments

see below....

Letter 47, page 2

January 30, 2002

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

To Whom It May Concern:

Please accept the following comments in regard to Draft Supplement 1 to NUREG-0586, "Draft Supplement Dealing With Decommissioning of Nuclear Power Reactors," and place them into the public record.

CL-47/1 Public Citizen is very concerned about several aspects of this supplement to NUREG-0586, specifically those that could pose risks to public health, the public's right to

CL-47/2 participate in decisions that affect them, and environmental quality. Additionally, Public Citizen is concerned that the provisions outlined in the Supplement might allow owners and operators of nuclear power reactors to reduce or completely evade their civic, environmental, economic and legal responsibilities.

CL-47/3 Having stated that, we would like to make it abundantly clear that we see decommissioning to be the most appropriate and responsible action to take with all

CL-47/4 nuclear reactors. Nonetheless, any and all decommissioning activities should be performed methodically and with great caution, ensuring that the public is appropriately

CL-47/5 involved in the processes and thoroughly protected from dangers every step of the way. Certainly, every reactor shut-down is another step away from further creation of radioactive waste, the ever-present possibility of nuclear terror (be it a reactor accident or

CL-47/6 terrorist attack) and the continuing irradiation of our everyday lives. Every shut-down reactor can take us a step closer to a sustainable energy future but, unfortunately, reactor shut-down is not the threshold of safety, where the public can be assured that no health or

CL-47/7 environmental dangers will originate from the site. There still remains a mountain of radioactive waste after shut-down, including the reactor itself and, typically, an incredibly dangerous stockpile of irradiated reactor fuel. Whereas the reactor itself and the equipment and materials of the central facilities are often treated as the object of decontamination, it must be noted that the previous operation of the plant has dispersed radiation and contamination that did not regard the facility's fenceline as a barrier. Any serious approach to decommissioning a site must take this into account.

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E-RIDS = ADM-03
Add = M. Masnik (MTM2)

CL-47/8 Decommissioning should not be a final opportunity for the nuclear industry to "take the money and run" - be it to make a profit from inadequate cleanup and monitoring, or to limit losses from costs that had been underestimated for decommissioning throughout the

CL-47/9 operating lifetime of the nuclear reactor. There should be no allowance for the industry to