

PUBLIC SUBMISSION

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Docket: NRC-2021-0036

Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

Comment On: NRC-2021-0036-0001

Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

Document: NRC-2021-0036-DRAFT-0052

Comment on FR Doc # 2021-02357

Submitter Information

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General Comment

Please find attached the comment by Jan Boudart asking for more time to submit comments on NRC 2021-0036

Attachments

MoreTimeOn NRC2021-0036JanBoudart

U.S. Nuclear Regulatory Commission

By Jan Boudart

Re: Docket ID NRC 2021-0036

NUCLEAR REGULATORY COMMISSION [Docket Nos. 50-155, 50-255, 72-007, and 72-043; NRC-2021-0036] Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

This document is an appeal for more time to comment on the license transfer mentioned in the previous sentence.

Introduction

1. We need more time to respond to requests for comment from the NRC, the DOE and other government agencies.
2. An inadequate effort is made by the NRC and the DOE to reach out to stakeholders for comment.
3. NRC and DOE is overloading the public with requests for comments on decommissioning license transfers, and the versatile test reactor.

Part 1: Appeal for more time

1. Stakeholders should be given 6 months from the time the COVID 19 pandemic officially ends to comment on the very important issues regarding nuclear power plants, license transfers, and the safety and ethical standards of businesses and corporations. The merchant reactors have a 40-year life span; plutonium waste has a 24,000 year half-life, yet the public is inadequately informed of deadlines which are sometimes less than 60 days from the call for comments. What is your hurry?
2. Most of the public is unfamiliar with the federal register; thus, posting a notice in the FR is an inadequate way to inform people of life-and-death nuclear matters.
All stakeholders need an opportunity to understand nuclear issues and to form opinions about radiation and its sources. At the very least, when a license transfer is going to take place, notices should be posted in the jurisdictions affected and people's electricity bills should include a timely request for comment with essential information included. As many stakeholders as possible should be informed.
Who is or is not a stakeholder is in the eye of the definer. But by any conception, when it comes to nuclear power, nuclear waste, and especially nuclear radiation everybody is a stakeholder because our sources of water, food and the health of our bodies are at **stake**. This includes the animals and plants. Their bodies and their sources of nourishment, air, water, food, have all been, and will continue to be affected by radiation.
Families with children should be targeted with an advertising campaign. Special vulnerabilities exist among the young of all species; and this has been particularly well-studied in humans. (BEIR VII: <https://www.nap.edu/catalog/11340/health-risks-from-exposure-to-low-levels-of-ionizing-radiation>) The Gender and Radiation Impact Project <https://>

www.genderandradiation.org/ went forward with the data from BEIR VII to show that human women are more vulnerable than men, that the young are more vulnerable than adolescents who are more vulnerable than “reference man”. Thus, all biological organisms have a **stake** in what is planned for the fission project. Shrinking “stakeholder” to indicate those who have a specific monetary **stake** in projects is simply nonsensical.

In the presence of radiation, stakeholder has no unique meaning so all possible effort should be made to inform people when a matter affecting their lives and health will be taking place.

In addition, virtual meetings do not serve many stakeholders. A rural population may not have internet, may not be computer savvy, or may not be able to afford the wherewithal to attend a webex-combined-with-cell-phone meeting.

And people like to see each other. The degree to which we care about an issue may be subdued by electronic gadgets. Webex is useful, but public, face-to-face meetings can be held when the pandemic is over.

3. Staff members of NRC, DOE and nuclear corporations and utilities have specialized knowledge and an inside track; and they are well paid for their work. Many of the comments are coming from lay people, who spend their time becoming informed of the technical, legal and ethical issues to the best of their ability. Usually they are not paid for their work on nuclear issues, but are volunteers. The NRC and the DOE seem to be taking advantage of the pandemic, saving themselves the expense and trouble of having real public meetings. This critical time is overloaded with deadlines, webinars and long virtual meetings.

Here is a list of deadlines and meetings from February 18 to March 23, 2021

2/18: Environmental Impact Statement for the Surplus Plutonium Disposition Program. DOE plans to deposit 34T of Pu at WIPP

2/17: Public (Virtual) Hearing on the subsequent renewed operating licenses which would authorize the applicant to operate **Point Beach** for an additional 20 years beyond the period specified in each of the current renewed operating licenses. [The 20-year extensions of current licenses has not yet started; thus, this is a query whether to extend the life of Point Beach NPP to 80 years.] [Docket ID NRC-2021-0021]

2/24: Request a hearing on Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments (Docket ID: NRC-2021-0036)

2/26: Comment whether United Nuclear Corporation should be allowed to pile radioactive mine slag on top of Church Rock Mill tailings (NRC 2019-0026)

3/1: Public (virtual) meeting CRN PEIS Live Scoping Open House for TVA’s proposed Programmatic Environmental Impact Statement for its “advanced nuclear reactor technology park”

3/2: Comment on the adequacy of the Versatile Test Reactor EIS

3/3: Submit opinions on the scope of the Point Beach EIS (NRC 2020-0277)

3 / 8: Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments (Docket ID: NRC-2021-0036)

3/13: Inform the NRC secretary that by 3/23 you will be filing a petition for leave to intervene in Point Beach License 20- or 40-year license renewal [Docket ID NRC-2021-0021]

3/15: Public (virtual) meeting on Consolidated Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria (NRC 2020-0192]

3/19: deadline for scoping comments on the CRN-EIS for TVA's proposed Programmatic Environmental Impact Statement for its "advanced nuclear reactor technology park"

3/23: Submit your request for a hearing or petition to intervene in Point Beach License 20- or 40-year license renewal. [Docket ID NRC-2021-0021]

Summary

The NRC and the DOE need to slow down, or even coordinate their requests for comments and their scheduling of meetings regarding the fission project in the U.S. These issues have plenty of time for resolution. Now we are in the midst of a pandemic, and it seems the NRC and the DOE are taking advantage of this, which is a personal crisis for many, to overload the schedule with comment deadlines and public meetings.

My ask is that you give us more time to comment on the license transfer at Palisades NPP and Big Rock Point.