

# RIVERKEEPER

January 11, 2012

NRC Commission Meeting to Discuss Proposed Revisions to 10 CFR Part 51, Update to GEIS for License Renewal

## Summary of Comments

- 1. Inadequate Assessment of Inadvertent Radioactive Releases to the Environment**
  - a. New Cat. 2 Assessment only addresses groundwater contamination
  - b. New Cat. 1 Assessment – Exposure of Aquatic Organisms to Radionuclides is improperly limited to *normal operations*.
  - c. Expansion of Cat. 2 Assessment of Threatened or Endangered Species to include “essential fish habitats” should specifically include impacts from radiological releases, both routine and inadvertent.
  - d. Cumulative impacts of routine and inadvertent releases must be assessed.
  - e. Recommendation: NRC must require a comprehensive, site specific (Cat. 2) analysis of the impacts of inadvertent/accidental radiological releases on all relevant environmental media – aquatic species, water quality, soil/sediments, terrestrial species, and endangered/threatened species and related habitat, as well as available mitigation measures to avoid or remediate such impacts.
- 2. New Cat. 2 Assessment of non – radiological contamination of groundwater and soil fails to include specific requirement for licensees to publicly disclose all information of historic leaks, spills and other industrial releases that contributed or may have contributed to contamination of the plant site. GEIS, 4-45, 4-46.**
- 3. Failure to require site-specific (Cat. 2) assessment of emergency preparedness effectively precludes meaningful public participation in the license renewal process and violates NEPA.**
- 4. Failure to require consideration of spent fuel pool accidents under the NEPA SAMA analysis does not comply with the NEPA requirement that all reasonably foreseeable impacts of license renewal be assessed.**
- 5. Category 1 Classification of nuclear waste storage impacts does not comply with NEPA, because it fails to assess or integrate new and significant information that has arisen since the GEIS update was issued in 2009, including the federal government’s official abandonment of the Yucca Mountain repository and the nuclear disaster at the Fukushima Daichi nuclear power plant in Japan in March 2011.**