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24 July 00
2:30pm

65FR 34741
May 31, 2000

(2)

July 14, 2000

Sent via certified mail

Sent via email to DGEIS@NRC.GOV

Chief of Rules and Directives Branch
Div. of Administrative Services
Office of Administrator
Mail Stop T-6D 59
U.S Nuclear Regulatory Commission
Washington, D.C. 20555-0001

RE: Supplement to the Final Generic Environmental Impact Statement of Nuclear Facilities, NUREG-0586, for power reactors only.

COMMENTS OF CAMPAIGN FOR A PROSPEROUS GEORGIA

The following comments are filed by Campaign for a Prosperous Georgia (CPG) as part of the Final Generic Environmental Impact Statement (EIS) of Nuclear Facilities process, NUREG-0586, for decommissioning of power reactors only.

CPG is a non-profit conservation and energy consumer organization headquartered in Atlanta with a field office located in Savannah. We are a statewide organization with members throughout Georgia and have focused on energy and nuclear concerns for 17 years.

General Comments

According to the Nuclear Regulatory Commission (NRC):

“Although decommissioning is not an imminent health and safety problem, the nuclear industry is maturing. Nuclear facilities have been operating for a number of years, and the number and complexity of facilities that will require decommissioning is expected to increase in the near future.”

CPG does not believe that a generic EIS regarding decommissioning of nuclear facilities is a sufficient tool for evaluating the environmental impacts borne to specific environments from decommissioning a nuclear power plant. It is important that the EIS address the conditions unique to the locale of the nuclear facility. Nuclear power plants are located in many different types of ecosystems throughout the country--from wetlands that require very specific hydrological studies to forested regions that require intensive wildlife and habitat studies, for example. Additionally, each nuclear power plant has a different historical performance record that may have

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impacted the surrounding environment in ways that are unique to the facility. These factors, among others, must be incorporated in addressing the decommissioning of individual facilities.

Economic Comments

All decommissioning costs should be borne by the parent company of the licensee in perpetuity. The parent company should not be allowed to recoup the costs of decommissioning from the ratepayer or federal government (i.e., the taxpayer). Ratepayers and taxpayers in Georgia have already had to pay far beyond their share of promised “cheap” nuclear power that has brought some of the largest rate hikes ever in Georgia.

The parent company should post a guaranteed bond—including one-half cash—to pay for the Nuclear Regulatory Commission’s (NRC) inspections along with containment, remediation, and clean-up costs in perpetuity.

Provisions for environmental staff and maintenance staff should be established in perpetuity and all costs should be borne by the parent company of the licensee. The local community, state, ratepayer or taxpayer should not shoulder these costs.

Third party verification of decommissioning plans must occur due to the site-specific nature of the reactor sites. These costs should be the responsibility of the parent company.

Environmental Comments

As stated earlier, CPG believes that decommissioning should be done on a site-specific basis with an emphasis on the hydrology, climate, geology, wildlife community and habitat, migratory species, ecosystem characteristics, among other concerns, of the region impacted by the nuclear facility. This includes the area of the site itself along with downstream and downwind regions and all areas within the ingestion radius of the facility.

Wells within a five (5) mile radius of the nuclear facility should be monitored. If contamination at any level is discovered at any well, ground water pumping or proper remediation procedures should occur. These costs should be the responsibility of the parent company and not of the property owner, unless of course the owner is the parent company or licensee. Private landowners whether residential or commercial, farms, federal, state, county, city, community properties or others should not be responsible for the costs of monitoring, containment, or clean-up. Safe, alternative water supplies should be provided to affected residents and businesses.

The nuclear facility should be covered with a replaceable mesh screening to prevent migratory birds from landing on the site and nesting. Additionally, if other fauna are present in and around the region, subsequent prevention of their entrance to the site needs to occur to prevent foraging, nesting, etc.

Sediment deposited in front of nuclear facility discharge valves up to a mile downstream from the site perimeter must be removed and treated as hazardous waste to be disposed of properly according to appropriate regulatory guidelines that will not further contaminate the affected region. The parent company of the licensee should be responsible for the costs incurred.

Health & Safety Comments

Exclusion zones need to be established around the nuclear facility in question at a certain radius outside the site perimeter to prevent people from entering the site. This radius should extend beyond the fence line and should be maintained in perpetuity.

Spent fuel pools and associated ISFSI should have additional shielding added above, underneath, and around them to aid in containment and protect the health of the public, surrounding flora, fauna, and environment. The associated Independent Spent Fuel Storage Installation (ISFSI) should be covered with a concrete dome with necessary internal filtration and cooling systems.

The nuclear facility's land, even after decommissioning is considered "complete", must not be allowed to revert to public or private use even if the NRC believes that the radioactivity on the land is less than 25 millirems per year. Additionally, under no circumstances should future buildings, structures, etc. be built atop the former nuclear site.

All dockets that dealt with the nuclear facility must be reviewed prior to decommissioning to ensure that all previous problems or concerns with the site are taken into account and are addressed properly and thoroughly in decommissioning plans.

Low-Income Population Impacts

There is not adequate attention to issues surrounding economic justice and the long-term, negative economic implications of decommission plans in the community. Reactor sites are often contaminated to the extent that the location is made undesirable for future economic development.

Land deeds on lands within a certain radius of the site perimeter, including the licensee's land, should be marked in perpetuity to prevent re-sales to unsuspecting persons., to be marked dead zones and filed in local, county and state courthouses.

No Recycling of Radioactive Materials

There should be no recycling of any radioactive materials.

Use of Contractors

Contractors should be qualified with experience in working with nuclear materials and should not be allowed to sub-contract to companies or individuals who do not have a proven track record of working with nuclear materials.

Handling of Generic Industry Problems

We have concern that the NRC frequently categorizes problems as generic industry problems. We request that the NRC treat all problems and areas of concern raised during decommissioning plans as "site specific problems"-- not generic industry problems.

Conclusion

The reevaluation of this decommissioning policy may constitute a major NRC action affecting the quality of the human environment. We stress the need for site-specific Environmental Impact Statements on decommissioning for nuclear power reactors.

Respectfully submitted,



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