

65 FR 53047

Yggdrasil Institute
PO Box 131
Georgetown, KY 40324
October 13, 2000

8-31-00
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Office of Nuclear Reactor Regulation
Mail Stop O-12H19
US Nuclear Regulatory Commission

Comments on Draft Regulatory Guide DG-1104, the draft SRP-LR, the draft GALL report, and NEI 95-10 (Revision 2)

I am writing to ask that the comment period on the above documents in regard to extension of reactor licenses be itself extended an additional 60 or 90 days past October 16 and that the issues that these documents involve be submitted to the public during that period in terms that the public can comprehend and to which members of the public can therefore respond. Public meetings should be held near reactor sites.

As I understand it, the central issue is whether to allow US nuclear reactors a generic twenty-year extension of their licenses. I may have phrased the contemplated terms incorrectly due to the complexity of their presentation, but this does not change the nature of my request. The complexity of the presentation is part of the problem. Any plan to extend reactor licenses should be clearly put before the public, not hidden away in a series of documents with obscure names that members of the public are invited to download from the internet. Also, the request for advice should not be so technical that it makes a member of the general public feel that he or she cannot say anything useful and therefore should not even try to express himself or herself.

No extension should be granted to any reactor without a thorough, physical examination of the reactor by independent experts, not employees of the licensee. Emerging problems with reactor vessel embrittlement would alone mandate this course. Furthermore, any extension should be for no longer than ten years.

Sincerely,

Mary Byrd Davis (PhD)
Director, Yggdrasil Institute, a project of Earth Island Institute

Template ADM013

ERIOS-03
add Steve Koenick
SSK2
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RKA ADM03