

65 FR 53647

8-31-00

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**From:** Marcello Aurelio Lanfranchi <marcello@sirius.com>  
**To:** "pgn@nrc.gov" <pgn@nrc.gov>, "CHAIRMAN@nrc.gov"...  
**Date:** Sat, Oct 14, 2000 3:50 PM  
**Subject:** Generic Aging Lessons Learned Nuclear Power Plant Re-licensing Procedures

To: Patricia Norry, Director  
 Rules and Directives Branch, Division of Administrative Services  
 US Nuclear Regulatory Commission  
 Washington, DC 20555

Dear Director Norry,

The Nuclear Regulatory Commission (NRC) plan to allow nuclear reactor owners to obtain 20-year license extensions based primarily on the "Generic Aging Lessons Learned" report is simply wrong. There were no public hearings on this report or the NRC's plans based on the report. There is no way that the GALL report could adequately cover all that could go wrong with aging reactors. The NRC's top priority should be to shut down nuclear plants, not give them another 20 years to pollute our communities and run an ever-increasing risk of meltdown.

Extended licenses should not be considered at all, but if they are, they should only be considered case-by-case. The particular ecosystems of each site and surrounding areas should be the primary consideration, followed by the complete and detailed history and prospects of each reactor and each owner-including but not limited to maintenance history, labor practices, financial condition, and responsiveness to public concern. The plants were built with different designs; by different contractors; with several differences in every aspect of construction, upkeep, and retrofits. Current owners have different abilities and willingness to take care of the reactors now and in the future. The impacts of the various electricity deregulation processes in each state must also be taken into account.

I am outraged that there will be no public hearings in the communities where these reactors are located. Holding only one hearing in December 1999 at NRC headquarters demonstrates the NRC's unwillingness to allow any public participation.

There must be many public meetings in each city and town within 100 miles of nuclear reactors, to ensure that everyone is aware of the implications of re-licensing. At each meeting, and throughout the process, there must be a thorough airing of information about damages caused by radioactive emissions from "normal" nuclear reactor operations. For instance, studies published in May 2000, show that there are heightened rates of infant mortality and breast cancer in communities near reactors, and that these rates go down when reactors are decommissioned. The consequences of a catastrophic accident must also be spelled out. The government's own studies predict that a meltdown could kill more than 100,000 people and cost over \$300 billion.

There are many reasons why license extensions should be denied. These are not fully addressed in the GALL report. Dave Lochbaum, nuclear safety engineer for the Union of Concerned Scientists clearly states the risk: "The prudent and proper course of action is to retire aging nuclear plants before they reach the point where reliability drops off markedly."

US nuclear power plants were all built using technology that is 30 to 40 years old-and extensively modified so that they bear no relation to their original technical specifications. These plants must be decommissioned before they deteriorate further, especially now that nuclear operators are increasingly squeezed by economic uncertainties in the deregulated electric power market. Many are already cutting corners on maintenance and staff.

Ironically, deregulation has unexpectedly made it more attractive to continue running nukes. In states where ratepayers are being forced to pay off nuclear construction costs, day-to-day nuclear operations are for the first time competitive with other forms of power.

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In states without nuclear bailout provisions, it is also proving attractive for utilities to re-license and continue operating some nuclear plants, because this gives them 20 more years to collect money from ratepayers to pay off nuclear construction debts and build up decommissioning funds.

In either case, extended licenses encourages owners to keep plants running --or to sell them for an opportunity to escape further responsibility. Companies that have recently purchased a number of US and Canadian reactors exhibit the lowest standards yet seen in the nuclear industry, specializing in squeezing out the most megawatts with the least possible investment.

The vast majority of people in the United States and most of the world oppose nuclear power. Re-licensing the reactors flies in the face of democratic desires as well as common sense. In spite of the industry and the NRC's attempts to hide information, people know enough about the consequences of nuclear disasters and the accumulation of nuclear waste to know that we must end the use of nuclear power as soon as possible. There are a plethora of alternatives that can replace nuclear power. It is time for the US government to drop its support for this obsolete and extraordinarily damaging technology, so that full-scale development of the alternatives can proceed.

Sincerely,

Marcello Aurelio Lanfranchi  
Ecological Villager's Alliance  
780 17th St.  
Richmond, CA 94801

CC: "Barbara Boxer" <Senator@boxer.senate.gov>, "Ba...