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From: Dirk De Lu <dirknjanet@juno.com>
To: <pgn@nrc.gov>
Date: Mon, Oct 16, 2000 2:27 PM
Subject: No Generic Relicensing

Dirk De Lu 455 Granite Ridge Santa Cruz, CA 95065 1-15-00

Patricia Norry, Director, Rules and Directives Branch, Division of Administrative Services, U.S. Nuclear Regulatory Commission

Re: Generic Aging Relicensing Procedures

Dear Ms Norry:

Please consider the ramifications of your agency's impending relicensing. Are you prepared to be a part of a short sighted economically driven effort that can result in mass deaths and ecological devastation? In your heart; how do you truly feel about this move? Can you look a child in the eye and tell them that you are absolutely, 100% certain that you are not signing a death warrant?

I strenuously oppose 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" one-size-fits-all report, with no public hearings. There is no way that the GALL report could adequately cover all that could go wrong with aging reactors. It is time to close the nukes, 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 all sorts of differences in the conditions of construction, upkeep and retrofits; and 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 should also be taken into account.

It is galling in the extreme that there will be no public hearings in reactor communities for a decision of this magnitude. Holding only one hearing in December 1999 at NRC HQ shows that the NRC has no intention of allowing true public participation.

There should be not one but many public meetings in each city and town within 100 miles of nuclear reactors, to make sure that everyone is aware of the implications of relicensing. At each meeting, and throughout the process, there should be a thorough airing of information about damages caused by radioactive emissions from "normal" nuclear reactor operations. For instance, studies published

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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 close.

There are many generic reasons why license extensions should be denied. Are these fully addressed in the GALL report? Dave Lochbaum, nuclear safety engineer for the Union of Concerned Scientists clearly states the risk: "During the early stage of life and the late stage, the failure rate for both man and machines is generally higher than during middle age; the reliability of both man and machines is generally lower during the early and late stages. The prudent and proper course of action is to retire aging nuclear plants before they reach the point where reliability drops off markedly."

U.S. nuclear power plants were all built with technology that is 30 or 40 years old-and extensively modified so that they bear no relation to their original technical specifications. These souped-up old jalopies are a menace to us all. They should be shut down 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.

Deregulation unexpectedly made it more rather than less 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.

In states without nuclear bailout provisions, it is also proving attractive for utilities to relicense 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 some quick money and a chance to escape further responsibility. Companies that have recently purchased a number of U.S. and Canadian reactors and want to buy more, 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 many parts of the world oppose nuclear power. Relicensing 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, the people of the world know enough about the horrendous consequences of nuclear errors to know that we must end this ill-starred experiment as soon as possible. There are plenty of alternatives that can replace nuclear power. It is time for the U.S. government to drop its support for this obsolete and extraordinarily damaging technology, so that full-scale development of the alternatives can proceed.

Sincerely,

Dirk De Lu