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Rules and Directives Branch USNRC

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Oct 16, 2000

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

Re: Draft Report: Generic Aging Lessons Learned
Nuclear Power Plant Relicensing Procedures

Dear Patricia Norry,

I object to the NRC's plan to allow nuclear reactor owners to obtain 20-year license extensions based primarily on the "Generic Aging Lessons Learned" report. It is impossible for the GALL report to adequately address all the problems with the aging reactors. The utility industry's 103 operating reactors were built with differing designs, by various contractors, with all sorts of distinctions in the conditions of reactor construction, upkeep and retrofits.

Proposals for extended licenses should only be considered on a case-by-case basis by the NRC. Particular reactors at each site and their impacts on surrounding areas should be the NRC's primary consideration. The NRC must also consider a detailed history and status of each reactor and each owner/operator—including its accident history, embrittlement of recirculation pipes, maintenance history, labor practices, financial condition, and responsiveness to public concern. The impacts of the various electricity deregulation programs in each state should also be taken into account.

Furthermore, it is essential that public hearings be conducted in reactor site communities before taking a decision of this magnitude. The NRC's plans for allowing only one hearing at NRC HQ shows that the NRC must be afraid of public participation.

There should be public hearings in every town within 100 miles of operating reactors to make sure that people can learn the implications of re-licensing. At each meeting, and throughout the process, there should be a thorough airing of information about damages caused by radioactive emissions from "normal" reactor operations. Studies published in May, 2000 by the Radiation and Public Health Project in New York show that there are heightened rates of infant mortality and breast cancer in communities near operating reactors, and that these rates go down when the reactors close. The consequences of a catastrophic accident should 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 generic reasons why license extensions should be denied. 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 [hu]man[s] and machines is generally higher than during middle age; the reliability of both [hu]man[s] 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."

Sincerely,

John LaForge

John M. LaForge

Co-director
Nukewatch

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Add Raj Anand (RKA)
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