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From: Dave Matthews <david.matthews@sun.com>
To: <dgeis@nrc.gov>
Date: 1/21/02 10:52AM
Subject: Decommissioning Nuclear Power Reactors EIS Supp1

Dear Sirs,
I am writing to comment on the EIS supplement 1.

In general, I am strongly opposed to the attempts to designate many issues as generic instead of site specific and thus to remove these issues form public review and comment.
Specifically , I am opposed to the following proposals in the EIS:

NRC allows "rubblization" (crumbling the concrete reactor building) of nuclear reactors, without opportunity for public intervention until the action is completed.

NRC allows portions of sites to be "released" from regulatory control before the whole site it released.

NRC opens up two "entombment" options.

NRC ignores radiation dangers after decommissioning is done and utility is relieved of liability.

NRC ignores radiation exposures to children and other vulnerable members of the population and creates a fictitious highest exposed "critical group" based on unsubstantiated assumptions.

NRC ignores radiation offsite and permits utilities to ignore it in decommissioning planning. I ask that the NRC incorporate offsite contamination into all evaluations of environmental impacts.

NRC prevents the National Environmental Policy Act from applying to most of the decommissioning process.

NRC redefines terms to avoid local, site specific opportunity to question, challenge and prevent unsafe decommissioning decisions.

NRC sets arbitrary and unsubstantiated (low, medium and high) environmental impact categories for each of the steps in decommissioning, to give the appearance that they have minimal effects, to justify not fully addressing them now and to prevent their inclusion in site-specific analysis.

NRC is removing the requirement for a license amendment when changing from a nuclear power operating license to a nuclear materials possession-only license. (With no license amendment, there is no opportunity for public challenge or adjudicatory processes.)

NRC is attempting, with this supplement, to legally justify the removal of the existing opportunities for community involvement and for legal public intervention until after the bulk of the decommissioning has been completed. This includes such activities as flushing, cutting, hauling and possibly rubblizing of the reactor.

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Rules and Directives

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

NRC states that the portion of the decommissioning regulations (10 CFR 20 section E and its Environmental Impact Statement, NUREG 1496) that set the 25, 100 and 500 millirems per year allowable public dose levels from closed, decommissioned nuclear power sites, are not part of the scope of this Supplement

NRC defines decommissioning, in part, to include the "release of property for unrestricted use...." and the "release of property under restricted conditions..."
I stand firmly against the "release" of radioactively contaminated materials into daily consumer use and commerce or unregulated disposal.

Thank you
David Matthews