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From: "john runkle" <jrunkle@mindspring.com>
To: <dgeis@nrc.gov>
Date: 1/28/02 1:11PM
Subject: Decommissioning Nuclear Power Reactors EIS Supplement 1

VIA EMAIL & Mail

1/29/02

From: Conservation Council of North Carolina, Post Office Box 12671, Raleigh, North Carolina 27605;
 telephone: 919-839-0006

To: Chief, Rules Directives Branch; Division of Administrative Services; Mailstop T 6 D 59; U.S. Nuclear
 Regulatory Commission; Washington D.C. 20555-0001

Re: Draft Decommissioning Nuclear Power Reactors EIS Supplement 1 (Supplement to NUREG-0586)

Dear Sir:

The Conservation Council of North Carolina is a statewide environmental organization with a long history of involvement in nuclear plant licensing, waste storage and decommissioning. We offer the following comments on the NRC's Draft Decommissioning Nuclear Power Reactors EIS Supplement 1:

1. We are deeply concerned about the NRC's proposal to treat almost all decommissioning issues in a generic EIS rather than in an individual EIS for each plant. As we have seen in many of the licensing proceedings, nuclear plants have a wide variety of dissimilarities, even with other plants owned by the same utility and constructed by the same companies. These differences are compounded when it comes to decommissioning as the different work plans for each plant may have considerably different impacts on workers on-site and the public off-site.
2. All decommissioning activities need to consider the impacts of radiation exposure to workers and the public. Radiation exposures to children and other vulnerable members of the population should be separately and realistically addressed with all pathways to exposure closely examined. Assumptions about off-site exposure should be substantiated with full peer-review from neutral parties, i.e. not employees of the nuclear utilities. The risk to public health cannot be minimized or discounted.
3. Decommissioning should never be deemed to be complete until the entire site is no longer radioactive. We understand that this means extremely long-term oversight of the reactor sites. Some of the decommissioning wastes, such as the nickel compounds, have extremely long half-lives and remain dangerous for millennia. Liability for the site needs to remain with the utilities and the NRC must retain regulatory control over the entire site.
4. As we have previously commented in other dockets, there should be no release of radioactively contaminated material of any kind into consumer use or into general commerce. Disposal of all materials from decommissioning need to be regulated, regardless of whether they are radioactive or not.

Please notify me of any decision you make regarding this docket.

Sincerely,

John D. Runkle

General Counsel

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E-RIDS = ADM-03
 Add = M. Hershnik (MTH2)