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Rules and Directives

Chief, Rules and Directives Branch
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US Nuclear Regulatory Commission
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To Whom it May Concern:

The following constitutes my comments on NUREG;V0586 Draft Supplement 1 Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities--Draft Supplement Dealing with Decommissioning of Nuclear Power Reactors:

Several years ago I attended a meeting between representatives of several investor-owned electric utility companies that were attempting to work out a common position on utility deregulation for the state of Indiana.

At one point in the discussion a representative of American Electric Power, owner of the D.C. Cook Nuclear Plant, made a most revealing statement. Concerned that nuclear power could not compete with other forms of electric generation, the AEP representative pointed out that, following decommissioning, they could not just come in with a wrecking ball, knock the plant down and haul the rubble off to the nearest landfill. Instead, he said, the closed plant would have to be indefinitely isolated from the environment. His exact words (delivered with great emphasis) were "that means fences, guards and guard dogs FOREVER!"

Now, with Supplement I to NUREG;V0586, the NRC would appear to be paving the way for the very rubblization and possible release into the environment of "slightly contaminated" material that the AEP rep said could not happen.

The vehicle to allow this would appear to be the declaration of more decommissioning issues "Generic" rather than "Site-Specific," thus preempting the right of local residents to raise concerns during the License Termination Plan review.

Some of my concerns about NUREG;V0586 include:

- „h the use of generic proceedings to eliminate site-specific evaluation of concerns;
- „h the generic approval of rubblization of reactor buildings and leaving them on site;
- „h the vague and arbitrary use of "Small, Moderate, and Large" significance levels and the intent for use of these designations, which echoes previous attempted bogus designations such as "below regulatory concern";
- „h the extent to which radioactive contamination levels that are permitted to be "released" from regulatory control for decommissioning would result in the release of radioactive materials routinely;

The draft GEIS says that "low-level" radioactive waste disposal is not part of the scope of this GEIS. However, this would appear to be contradicted by the definition of decommissioning (pg. xii), and by the scope, the release and removal of Sites, Systems and Componets (SSCs).

I specifically oppose any release of contaminated materials during decommissioning or other times/ procedures.

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