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**From:** "Hugh Jackson" <hjackson@citizen.org>  
**To:** <Peach\_Bottom\_EIS@nrc.gov>  
**Date:** Wed, Nov 7, 2001 10:07 AM  
**Subject:** REVISED Peach Bottom Comments

Public Citizen  
Critical Mass Energy and Environment Program  
215 Pennsylvania Ave. SE  
Washington, DC 20003

Nov. 8, 2001  
Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mailstop T-6 D 59  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re: REVISED comments on Peach Bottom relicensing. THESE COMMENTS SUPERCEDE PUBLIC CITIZEN'S COMMENTS DATED NOV 7. MADE FROM THIS E-MAIL ADDRESS.

To Whom It May Concern:

Public Citizen opposes the relicensing of Peach Bottom nuclear power plant and all nuclear power plants, for reasons of safety and security.

In the weeks since Sept. 11, the NRC has quietly continued to process relicensing applications as if there were no heightened concerns about the safety of commercial nuclear facilities-which is to say as if it were Sept. 10. The scoping meeting on Peach Bottom scheduled for Nov. 7 is merely the latest display of an irresponsible business-as-usual approach.

NRC Chairman Richard Meserve has called for a comprehensive review of security safeguards at nuclear plants. Legislation pending before Congress would require the NRC, in consultation with the president, to write new rules designed to protect nuclear reactors and nuclear waste from potential attacks.

Yet the NRC is sticking to a schedule crafted months ago, and herding old nuclear power plants toward license renewals as if the September attacks never happened.

Security in the wake of Sept. 11 isn't the only reason the NRC should halt its relicensing process. Public Citizen has long opposed relicensing of nuclear power plants, because safety risks increase as reactor components age. For instance, reactor vessels can become brittle over time, or steam generator tubes can deteriorate and leak.

And the longer a reactor operates, the more nuclear waste it generates. The nation still has no workable solution for the disposal of deadly nuclear waste.

The Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS) notes that "conservation technologies produce enough energy savings to permit the closing of a nuclear plant" in most electricity service areas (NUREG-1437, Vol.1, 8.3.14). If the NRC insists on forging ahead with the Peach Bottom relicensing application-instead of taking the prudent step of suspending the relicensing process while security safeguards are reviewed-then Public Citizen calls on the NRC to take its own GEIS seriously. Specifically, in the Peach Bottom supplemental EIS, the NRC should conduct a comprehensive analysis addressing costs and environmental impacts of available conservation technologies. Further, the NRC should sincerely and honestly consider the potential of those technologies and energy efficiencies as the preferred alternative to license renewal.

Add: erids : Duke Wheeler *CD*

Sincerely,

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