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To: <dgeis@nrc.gov>
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Subject: NUREF-0586 Comments

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Chief, Rules and Directives Branch/ Division of Administrative Services/ Mailstop T 6 D 59
US Nuclear Regulatory Commission
Washington, DC 20555-0001

I am opposed to the following changes to NUREF-0586:

In Supplement 1 to the Generic Environmental Impact Statement on Decommissioning:

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. NIRS calls on the NRC to incorporate offsite contamination into all evaluations of environmental impacts.

NRC prevents the National Environmental Policy Act from applying to most of the decommissioning process. (The claim appears to be that this proposed Supplement 1 satisfies the Environmental Policy Act for most of the decommissioning issues.)

NRC makes most aspects of decommissioning "generic" rather than site-specific, so they cannot be legally reviewed or challenged at individual sites.

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

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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 rubbleizing of the reactor.

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."

If the changes pass, many key issues that local communities face as reactors close and owners leave (liability-free) will be unchallengeable, because they are being listed as "generic" issues. "Generic" decommissioning issues are ones that NRC determines apply to numerous reactors and which are supposedly being resolved with this Supplement to the Generic Environmental Impact Statement. "Site specific" issues are ones that can still be raised in local communities, but the opportunities to address even site-specific issues is being curtailed dramatically. I support the designation of environmental justice and endangered species issues as site-specific (not generic). I oppose Rubblization but supports its designation as site-specific.

Please consider my opposition to many of the proposed Supplements. The public should not be further shut out of the decommissioning process. Nuclear waste is deadly and it's handling should not be downgraded in any way.

Sincerely,
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