

**From:** "George Crocker" <gwillc@mtn.org>  
**To:** <nrcprep@nrc.gov>  
**Date:** Wed, Dec 31, 2003 4:22 PM  
**Subject:** Comment on fourth year implementation of reactor oversight process

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Rules and Directives  
Branch  
USNRC

Comment of:

North American Water Office  
 P.O. Box 174  
 Lake Elmo, MN 55042  
 651-770-3861

**RE:** Public Comment on the Fourth Year of Implementation of the Reactor Oversight Process  
 In Response to the Notice in the November 13, 2003 issue of the "Federal Register"  
 Vol. 68, No. 219, pp. 64374-64375

**Attn:** Michael T. Lesar  
 Chief, Rules and Directives Branch  
 Office of Administration (Mail Stop: T6-D59)  
 Nuclear Regulatory Commission  
 Washington, DC 20555-0001

Stuart A. Richards  
 Inspection Program Branch  
 Division of Inspection Program Management  
 Office of Nuclear Reactor Regulation

11/13/03

68 FR 64374

(12)

A hard copy of this comment will be sent via the U.S. Postal Service to Mr. Michael T. Lesar at the address listed above.

Comment of the North American Water Office:

The North American Water Office supports in their entirety the comments submitted to the U.S. Nuclear Regulatory Commission in the above captioned matter by the Union of Concerned Scientists, dated December 4, 2003, and adopts those comments as our own.

In addition, the North American Water Office offers the following comments.

While licensees report routine releases of radioactive liquid and gaseous substances, the reactor oversight takes no account of the biological effects, impacts or consequences of those releases. Despite the fact that these releases often involve hundreds of curies per year per reactor, nobody, including the NRC, licensees, state health departments, local units of government, or anyone else, has any idea where reported releases go. There is monitoring to determine where they are not, but monitoring is not designed or intended to specify where or how the radiation migrates through ecosystems and what it does in the process. Does the radiation concentrate in hot spots? No one knows. Are there human or animal receptors at hot spots? No one knows. So long as this gap remains in the reactor oversight process, the reactor oversight process is superficial and any claims regarding public health impacts of reactor operations, or lack thereof, are based on ideological belief not fact. Meaningful reactor oversight would require monitoring to determine the ecological, biological and environmental fate of radioactive substances that are routinely released by commercial reactors.

The reactor oversight process is not sufficient to protect against catastrophic failure of reactor components. Recent events point to this conclusion, including the vessel-head corrosion at Davis-Besse, the tube rupture at Indian Point, and numerous additional reported events. In short, regardless of the merits of the reactor oversight process, catastrophic failure has been averted in the recent past by blind luck as much as anything. As reactors age, there is no reason to believe that we will all continue to be so

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 Add = M. Maley (MSM3)  
 R. Frahm (RKF)

fortunate in the future. If the reactor oversight process were driven by common sense and a reasonable understanding of public interests, instead of the vested interests of the nuclear industry, the reactor oversight process would be providing for the deliberate and thoughtful phase-out of commercial nuclear operations. But as things stand, regardless of whatever else it is doing, the reactor oversight process is setting up an increasingly likely situation in which electric utility chaos will be piled on top of nuclear nightmare. Then, there are likely to be those who will hold you accountable.

Sincerely,  
George Crocker  
Executive Director