

PRM-51-10
71FR64160

6

From: "Rebecca Chin" <rebeccajchin@hotmail.com>
To: <SECY@nrc.gov>
Date: Tue, Dec 26, 2006 12:20 PM
Subject: Re: Docket No. PRM-51-10 - In support of MA AG's Petition for Rulemaking

Rebecca J. Chin -

31 Deerpath Trail North,

Duxbury, MA 02332

781-837-0009

Vice-Chair, Duxbury Nuclear Advisory Committee

DOCKETED
USNRC

December 26, 2006 (12:20pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary, U.S. Nuclear Regulatory Commission,

Washington, DC 20555-0001

Attn: Rulemakings and Adjudications Staff.

E-mail comments to: SECY@nrc.gov<mailto:SECY@nrc.gov>.

RE: Docket No. PRM-51-10 - in Support of Massachusetts Attorney General's Petition for Rulemaking I support the Massachusetts Attorney General's Petition for Rulemaking, in its entirety,

The factual basis of the AGO's argument was supported by vote of the Town of Duxbury at Town Meetings, 2003 and 2004 . The approved articles read:

Article 6 -Duxbury Town Meeting 2003

The Town of Duxbury advocates the immediate start to a move to Secured (1) Dry Cask Storage all but recently unloaded Spent Nuclear Fuel and a return to a low density storage pool at the Pilgrim Nuclear Power Station as an interim measure to better protect the health and well being of the citizens of the Town of Duxbury.

(1) The term "secured" means that a facility for storing spent fuel is made resistant to attack. Such resistance can be achieved in three ways. First, the facility shall be made passively safe, so that spent fuel remains in a safe state without needing electrical power, cooling water or the presence of an operating crew.

Second, the facility shall be "hardened", so that the spent fuel and its containment structure are protected from damage by an instrument of attack (e.g., an anti-tank missile). For a facility at ground level, hardening involves the provision of layers of concrete, steel, gravel or other materials above and around the spent fuel.

Template = SECY-067

SECY-02

Third, the facility shall be "dispersed", so that spent fuel is not concentrated at one location, but is spread more uniformly across the site. Dispersal can reduce the magnitude of the radioactive release that would arise from a given attack. Here the term "interim" means that this is a temporary, not a permanent storage solution, to the high level radioactive waste problem at Pilgrim.

Voted 3-0 by: Duxbury Board of Selectmen, November 12, 2002

Motion carried by Duxbury Town Meeting 2003

And

Article 27 -Duxbury Town Meeting 2004

The Town of Duxbury opposes Re-licensing Pilgrim Nuclear Power Station to operate until 2032 unless the following is required, accomplished, and certified to be in place by the licensee and NRC

- On-site security heightened to protect against: an air attack on the main reactor building, spent fuel pool and/or critical support structures by a large or small aircraft loaded with fuel or explosives; a floating explosive or underwater charge from entering the in-take canal; an attack by water or land from a force comparable in size and strength to 9/11. The adequacy of these security improvements must be approved by a panel of experts independent of the nuclear power industry.

- Safer storage of spent radioactive fuel rods until all spent rods are moved off site - low density pool storage and hardened dispersed dry cask storage, as approved by Town Meeting, 2003.

- Reduction of allowable radioactive emissions into our air and water so that the biological impact is no greater than that allowed from the releases from a chemical plant licensed today.

- Verification of releases by monitors - computer linked to state and local authorities - at all points where radiation is released from Pilgrim and at appropriate off-site locations.

- Replace the current water cooling system that draws in half-billion gallons of water a day and releases it at 30 degrees above Bay temperatures disrupting the ecosystem, with one not harmful to marine life - a closed cooling system.

- Updated emergency planning for the new security environment we face today, to protect against an attack or other fast breaking accident resulting in major consequence and accounts for the increased population density in Southeastern Massachusetts.

- Pilgrim's re-licensing process is expanded to include (a) a formal review of the differences between the safety regulations that Pilgrim is required to meet and the safety regulations that would be required if a new reactor was to be built today; and (b) a review of its aging management program.

The Clerk of Duxbury shall forward the text of this Article to the Town of Duxbury's State and federal delegation, to all Select Boards within the Emergency Planning Zone of Pilgrim NPS, the Nuclear Regulatory Commission and Entergy Corp., so that the intent of the Citizens of Duxbury is widely known.

Motion carried by Duxbury Town Meeting March 13, 2004

The citizens of Duxbury, a community within the Pilgrim Nuclear Power Station's Emergency Planning

Zone, recognized that safer spent fuel storage, as outlined in the articles, is essential to our safety and security; so too, is approval of the Massachusetts Attorney General's Petition for Rulemaking..

Submitted by,

Rebecca J. Chin

Rebecca J. Chin –
31 Deerpath Trail North,
Duxbury, MA 02332
781-837-0009
Vice-Chair, Duxbury Nuclear Advisory Committee

Secretary, U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff.
E-mail comments to: SECY@nrc.gov.

RE: Docket No. PRM-51-10 – in Support of Massachusetts Attorney General's Petition
for Rulemaking

I support the Massachusetts Attorney General's Petition for Rulemaking, in its entirety,
The factual basis of the AGO's argument was supported by vote of the Town of Duxbury
at Town Meetings, 2003 and 2004 . The approved articles read:

Article 6 –Duxbury Town Meeting 2003

The Town of Duxbury advocates the immediate start to a move to Secured (1) Dry Cask
Storage all but recently unloaded Spent Nuclear Fuel and a return to a low density
storage pool at the Pilgrim Nuclear Power Station as an interim measure to better protect
the health and well being of the citizens of the Town of Duxbury.

(1) The term "secured" means that a facility for storing spent fuel is made resistant to
attack. Such resistance can be achieved in three ways. First, the facility shall be made
passively safe, so that spent fuel remains in a safe state without needing electrical power,
cooling water or the presence of an operating crew.

Second, the facility shall be "hardened", so that the spent fuel and its containment
structure are protected from damage by an instrument of attack (e.g., an anti-tank
missile). For a facility at ground level, hardening involves the provision of layers of
concrete, steel, gravel or other materials above and around the spent fuel.

Third, the facility shall be "dispersed", so that spent fuel is not concentrated at one
location, but is spread more uniformly across the site. Dispersal can reduce the
magnitude of the radioactive release that would arise from a given attack. Here the term
"interim" means that this is a temporary, not a permanent storage solution, to the high
level radioactive waste problem at Pilgrim.

Voted 3-0 by: Duxbury Board of Selectmen, November 12, 2002
Motion carried by Duxbury Town Meeting 2003

And

Article 27 –Duxbury Town Meeting 2004

The Town of Duxbury opposes Re-licensing Pilgrim Nuclear Power Station to operate until 2032 unless the following is required, accomplished, and certified to be in place by the licensee and NRC

- On-site security heightened to protect against: an air attack on the main reactor building, spent fuel pool and/or critical support structures by a large or small aircraft loaded with fuel or explosives; a floating explosive or underwater charge from entering the in-take canal; an attack by water or land from a force comparable in size and strength to 9/11. The adequacy of these security improvements must be approved by a panel of experts independent of the nuclear power industry.
- Safer storage of spent radioactive fuel rods until all spent rods are moved off site - low density pool storage and hardened dispersed dry cask storage, as approved by Town Meeting, 2003.
- Reduction of allowable radioactive emissions into our air and water so that the biological impact is no greater than that allowed from the releases from a chemical plant licensed today.
- Verification of releases by monitors – computer linked to state and local authorities – at all points where radiation is released from Pilgrim and at appropriate off-site locations.
- Replace the current water cooling system that draws in half-billion gallons of water a day and releases it at 30 degrees above Bay temperatures disrupting the ecosystem, with one not harmful to marine life – a closed cooling system.
- Updated emergency planning for the new security environment we face today, to protect against an attack or other fast breaking accident resulting in major consequence and accounts for the increased population density in Southeastern Massachusetts.
- Pilgrim's re-licensing process is expanded to include (a) a formal review of the differences between the safety regulations that Pilgrim is required to meet and the safety regulations that would be required if a new reactor was to be built today; and (b) a review of its aging management program.

The Clerk of Duxbury shall forward the text of this Article to the Town of Duxbury's State and federal delegation, to all Select Boards within the Emergency Planning Zone of Pilgrim NPS, the Nuclear Regulatory Commission and Entergy Corp., so that the intent of the Citizens of Duxbury is widely known.

Motion carried by Duxbury Town Meeting March 13, 2004

The citizens of Duxbury, a community within the Pilgrim Nuclear Power Station's Emergency Planning Zone, recognized that safer spent fuel storage, as outlined in the articles, is essential to our safety and security; so too, is approval of the Massachusetts Attorney General's Petition for Rulemaking..

Submitted by,
Rebecca J. Chin

Mail Envelope Properties (459159E2.A33 : 0 : 35379)

Subject: Re: Docket No. PRM-51-10 - In support of MA AG's Petition for Rulemaking
Creation Date Tue, Dec 26, 2006 12:20 PM
From: "Rebecca Chin" <rebeccajchin@hotmail.com>
Created By: rebeccajchin@hotmail.com

Recipients

nrc.gov
 TWGWPO02.HQGWDO01
 SECY (SECY)

Post Office

TWGWPO02.HQGWDO01

Route

nrc.gov

Files	Size	Date & Time
MESSAGE	5103	Tuesday, December 26, 2006 12:20 PM
TEXT.htm	16892	
Chin response to support AG's Petition.doc		34304
Mime.822	73029	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
 This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
 Junk Mail handling disabled by Administrator
 Junk List is not enabled
 Junk Mail using personal address books is not enabled
 Block List is not enabled