

Rulemaking Comments

From: Edwin Lyman [elyman@ucsusa.org]
Sent: Tuesday, July 08, 2008 10:39 PM
To: Rulemaking Comments
Subject: Union of Concerned Scientists comments, docket NRC-2008-0237
Attachments: UCSreactorpolicycomments70808.pdf

The Union of Concerned Scientists is pleased to submit the attached comments on the Regulation of Advanced Nuclear Power Plants; Draft Statement of Policy, which was published in the Federal Register on May 9, 2008.

Sincerely,

Dr. Edwin S. Lyman
Union of Concerned Scientists
1825 K St, NW Ste. 800
Washington, DC 20006
(202) 331-5445
elyman@ucsusa.org

DOCKETED
USNRC

July 9, 2008 (9:35am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

July 8, 2008

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

**Comments on the Regulation of Advanced Nuclear Power Plants;
Draft Statement of Policy**

We commend the Nuclear Regulatory Commission for compiling a list of common-sense attributes that should be standard elements of any new nuclear plant design. In particular, the renewed emphasis on defense-in-depth is appropriate, given that several of the new reactor designs have cut back on defense-in-depth measures without adequate justification. However, unless the Commission explicitly requires that these features be incorporated into all new plants to be constructed in the United States (including those that have already been certified to weaker standards), we fear that the recommendations in the Draft Policy Statement will simply remain suggestions, which designers will be free to discard if they judge them to be too expensive or cumbersome. Thus, this revision will suffer from the same deficiencies as the original 1986 Advanced Reactor Policy Statement, which only included the “expectation” that advanced reactors will provide enhanced safety margins. This policy has failed to encourage designs that are significantly safer and more secure than the current generation of plants, and is in large part responsible for the crop of flawed designs now before the Commission.¹ At the time, Commissioner James Asselstine dissented from the policy for just this reason.

Therefore, we believe that this list of attributes, suitably expanded and otherwise modified in response to public comment, should be made into a formal requirement and incorporated into the regulations as additional General Design Criteria that all reactors to be built in the U.S. must satisfy from this point

¹ Lisbeth Gronlund, David Lochbaum and Edwin Lyman, “Nuclear Power in a Warming World: Assessing the Risks, Addressing the Challenges,” Union of Concerned Scientists, December 2007, pp. 53-68.



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

forward. Any new reactors built in the U.S. will likely operate for most of this century; we should take the time now to ensure that they are designed well.

Sincerely,

Dr. Edwin S. Lyman
Senior Staff Scientist
Union of Concerned Scientists
1825 K St, NW Ste. 800
Washington, DC 20006
(202) 331-5445
elyman@ucsusa.org

Received: from mail1.nrc.gov (148.184.176.41) by OWMS01.nrc.gov
(148.184.100.43) with Microsoft SMTP Server id 8.0.751.0; Tue, 8 Jul 2008
22:39:42 -0400

X-Ironport-ID: mail1

X-SBRS: 5.0

X-MID: 27271260

X-IronPort-Anti-Spam-Filtered: true

X-IronPort-Anti-Spam-Result: AulBM3zAc0jQMnEzImdsb2JhbACSDmEBAQEBCQUIGJ4L

X-IronPort-AV: E=Sophos;i="4.30,328,1212379200";
d="pdf?scan'208";a="27271260"

Received: from mail.ucsusa.org ([208.50.113.51]) by mail1.nrc.gov with ESMTTP;
08 Jul 2008 22:39:41 -0400

Received: from UCSUSA-MTA by mail.ucsusa.org with Novell_GroupWise; Tue, 08
Jul 2008 22:39:30 -0400

Message-ID: <4873EC53.64C0.00EE.0@ucsusa.org>

X-Mailer: Novell GroupWise Internet Agent 7.0.1

Date: Tue, 8 Jul 2008 22:38:52 -0400

From: Edwin Lyman <elyman@ucsusa.org>

To: <Rulemaking.Comments@nrc.gov>

Subject: Union of Concerned Scientists comments, docket NRC-2008-0237

MIME-Version: 1.0

Content-Type: multipart/mixed; boundary="=__PartDCF5EDAC.0__="

Return-Path: elyman@ucsusa.org