

Rec'd 1/22/10

RDB

PUBLIC SUBMISSION

As of: January 22, 2010
Received: January 22, 2010
Status: Pending_Post
Tracking No. 80a825b0
Comments Due: February 10, 2010
Late comments are accepted
Submission Type: Web

Docket: NRC-2010-0003
Open Government Directive

Comment On: NRC-2010-0003-0001
Implementation of Open Government Directive

Document: NRC-2010-0003-DRAFT-0008
Comment on FR Doc # N/A

1/11/2010
75 FR 1418

Submitter Information

PD

Name: Richard Webster
Organization: Eastern Environmental Law Center

General Comment

Response To NRC Open Government Initiative

Submitted by Richard Webster of the Eastern Environmental Law Center

We welcome this opportunity to provide comments regarding which data sets the NRC could most usefully place online. I discussed this issue more extensively in a law review article entitled "Spotlight on Safety at Nuclear Power Plants: The View from Oyster Creek," 26 Pace Environmental Law Review 365 (2009), which may be found at:

<http://digitalcommons.pace.edu/envlaw/569/>

That article concludes that there are a number of extremely high value data sets related to the safety of nuclear power plants that are not currently available to the public. These include:

- i) a compilation of links to documents that would allow the public to determine the Current Licensing Basis ("CLB");
- ii) a database of issued exemptions, violations (including NCVs), and license amendments, as well as ongoing corrective actions and investigations, with links to the relevant detailed documents;
- iii) a log of documents that have been withheld from public release with an explanation of the reason for the lack of disclosure;
- iv) licensee documents that the NRC has reviewed to make determinations regarding licensing, license amendments, exemptions, or violations (including NCVs).

We believe that the NRC is already in possession of all of the information that would be required to publish the information relating to ii) and iii) online. In addition, the agency has, or should have, most of the information to compile i), although we recognize that could take considerable effort to assemble. With regard to iv), we

SUNSI Review Complete
 Template = ADM-013
 E-REDS = ADM-03
 Call = S. Crockett (SFC) - J. Gschaeffer (JGS)

<https://fdms.erulemaking.net/fdms-web-agency/component/submitterInfoCoverPage?Call=Print&PrintId...> 01/22/2010

request that the NRC make it a policy to place all reviewed licensee documents online from now on. We are not asking the agency to go back and compile all the documents that it reviewed in the past.

Should you wish to contact me to obtain further details, please e-mail me at rwebster@easternenvironmental.org. Thank you for your consideration