

Rulemaking Comments

June 6, 2011 (2:45 pm)

From: patbirnie@greenbicycle.net
Sent: Monday, June 06, 2011 1:34 PM
To: Rulemaking Comments
Subject: Docket ID NRC - 2010 -0135 Please Deny Certification of ESBWR

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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To: Rulemaking and Adjudications Staff, U.S. Nuclear Regulatory Commission.

Re: Docket ID NRC-2010-0135

Summary: Please do not certify the GE-Hitachi ESBWR reactor design.

To the NRC Rulemaking and Adjudications Staff:

Members of the General Electric Stockholders' Alliance urge you to deny certification of the GE-Hitachi ESBWR reactor design for use in the United States.

In addition, we urge you to rescind the final design approval you granted on March 9, 2011, for the sale of this reactor abroad.

As the NRC has acknowledged, Japan's ongoing nuclear catastrophes at and beyond the Fukushima Dai-ishi plant involve the GE-designed Mark I BWR. I believe it is now obvious that a far more rigorous design review should be undertaken by the NRC, with new oversight regulations implemented.

The NRC's March 9th design approval of the GE-Hitachi ESBWR, enabling its sale overseas, took place two days prior to the Fukushima Dai-ichi tragedies. The NRC's public safety mandate should require that ALL licensing of new reactor designs be put on hold until the NRC's systems of regulations, oversight, and enforcement are thoroughly reviewed and, where required, are made more restrictive.

We have studied the October 31, 2008, testimony of Dr. Edwin S. Lyman before the NRC regarding the proposed GE-Hitachi ESBWR licensing for the proposed Victoria site in Texas. We conclude that a disturbing number of unresolved and untested safety-related design issues remain. While some of the issues Dr. Lyman specified may have been addressed, we believe the whole nuclear culture must be reviewed before ANY reactor designs are certified for potential construction.

We urge you to deny certification of the GE-Hitachi ESBWR reactor design for use at the Fermi complex in Michigan, or anywhere else in the United States or overseas.

We believe it is imperative that the NRC include a review of public health challenges worldwide from radiation as a basic part of your decision-making process.

Thank you for your consideration.

Patricia T. Birnie, Chair
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