

**From:** EXT-Berka, George <george.berka@boeing.com>  
**Sent:** Wednesday, January 28, 2015 12:58 PM  
**To:** RulemakingComments Resource  
**Subject:** Petition for Rulemaking: Please Consider Allowing Recently Shut Nuclear Plants to Re-start "As-is".

Good Afternoon,

The purpose of this e-mail is to submit a petition for rulemaking. I would like to request that any nuclear power plant, which has shut down within the past (7) years, and was operational at the time of shut-down, be permitted to simply re-start "as-is" without having to be upgraded to the latest standards, as is currently required.

This change would allow the 4 plants that closed recently (Kewaunee, Vermont Yankee, San Onofre, and Crystal River) to be allowed to simply re-start, should their owners decide to pursue this approach. It would also reduce the risk of losing additional nuclear plants in the future.

I believe that this approach would be safe, which no additional risk to the public, since the plants operated satisfactorily prior to shut-down, were well maintained, and had good overall safety records. This approach would also spare the plant owners the enormous cost of upgrading the plants to the latest standards. Otherwise, re-starting the plants would probably be cost prohibitive.

I am requesting this change for the following reason:

Existing nuclear power plants are perhaps one of the best tools that the country currently has to help deal with climate change. They are here and ready to run now. Relatively little time and money (compared to a new build) needs to be invested to get them back on line. When compared to renewables, they have great capacity in a relatively compact footprint, and essentially constant output. They provide clean, carbon-free energy at over a 90% capacity factor. These are their important attributes that we should recognize, and strive to do everything we can, as a nation, to save them and keep them on-line. The carbon-free generating capacity that we lost as a result of the closures of Kewaunee, Vermont Yankee, San Onofre, and Crystal River negated a considerable amount of the climate progress that we made in recent years by adding renewables to the grid.

It would not be unreasonable to say that this is somewhat of a priority situation, if the country wants to get serious about doing something about climate change now, not tomorrow. It is also the "low hanging fruit", when compared to other options. Allowing these plants to re-start could restore a significant amount of clean, carbon-free capacity to the grid, today, and for literally "pennies on the dollar",

compared to building new nuclear, or trying to replace the same capacity with wind or solar sources. Replacing lost nuclear capacity with natural gas or coal fired generation should be considered poor practice from a climate standpoint.

In summary, this simple change could be considered a “win-win” for everyone, with no real negatives or downsides. It could potentially open the door for over 4,000 megawatts of clean, carbon-free electricity to be restored to the grid, without compromising public safety.

If you are tempted to simply dismiss this petition, please consider soliciting public comment on it first. You may find that many members of the public may be supportive of this petition, because they are starting to recognize the valuable contribution that existing nuclear power plants make in the clean electricity arena.

Thank you,  
-George Berka  
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