

**From:** [Mary Olson](#)  
**To:** [Carneal, Jason](#); [RulemakingComments Resource](#)  
**Cc:** [Tim Judson](#); [Diane D"Arrigo](#)  
**Subject:** [External\_Sender] Request for Extension of Comment Period ANPR Decommissioning  
**Date:** Thursday, December 10, 2015 11:03:50 PM  
**Attachments:** [NRC GROUP LETTER-ANPR DECOMMISSIONING EXT REQ.pdf](#)

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Please see attached letter from the signed groups. If there is a difficulty with this transmission, please contact me.

Thank you,

Mary Olson  
Nuclear Information and Resource Service, Southeast  
[maryo@nirs.org](mailto:maryo@nirs.org)  
[www.nirs.org](http://www.nirs.org)  
828-252-8409 / 828-242-5621 cell

Nuclear Information & Resource Service \* Beyond Nuclear \* SanOnofreSafety.org  
VT Citizen Action Network \* Nuclear Energy Information Service  
Alliance for a Green Economy \* Vista 360 \* Safe and Green Campaign  
Nevada Nuclear Waste Task Force \* Citizens Allied for Safe Energy, Inc.  
Grandmothers, Mothers and More for Energy Safety (GRAMMES)  
Indian Point Safe Energy Coalition \* Nuclear Watch South  
California Communities Against Toxics \* Committee to Bridge the Gap  
Tri-Valley CAREs \* Ecological Options Network, EON  
Catskill Citizens for Safe Energy \* Sullivan Alliance for Sustainable Development  
Alliance for a Clean Environment

December 10, 2015

Jason B. Carneal  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
email: [Jason.Carneal@nrc.gov](mailto:Jason.Carneal@nrc.gov).

Cc: [Rulemaking.Comments@nrc.gov](mailto:Rulemaking.Comments@nrc.gov).

Re: **[NRC-2015-0070] "Regulatory Improvements for Decommissioning Power Reactors."**

Mr. Carneal:

The undersigned groups are united in this request for a full 90 day extension for the above captioned comment period.

On November 19, the Federal Register ( Vol 80, No 223, pages 72358—72373) carried the NRC "Advanced Notice of Proposed Rulemaking" that will impact: 10 CFR Parts 26, 50, 52, 73, and 140 [NRC-2015-0070] RIN 3150-AJ59 Entitled "Regulatory Improvements for Decommissioning Power Reactors." This was one week before a major holiday, and the notice, posted:

<http://www.gpo.gov/fdsys/pkg/FR-2015-11-19/pdf/2015-29536.pdf> states:

DATES: Submit comments by January 4, 2016.

January 4<sup>th</sup> falls after two more federal holidays. Given that NRC is requesting comment on the regulatory basis for what would be a sweeping new rule, it is reasonable that the impacted public (the groups signed here include many that are currently directly impacted by decommissioning) should have ample time to engage with the proposal.

As stated in the NRC Press Release (15-078) posted:

<http://pbadupws.nrc.gov/docs/ML1532/ML15323A189.pdf> , NRC is emphasizing public inclusion and transparency in this action:

In an "advance notice of proposed rulemaking" published today in the Federal Register, the agency announced its intention to develop a draft regulatory basis to support a new

decommissioning rule. The new rule would establish clear requirements for decommissioning reactors in emergency preparedness, physical security and fitness-for-duty, among other areas, thereby reducing the need for exemptions from current requirements designed for operating reactors. It would also address the timeliness of decommissioning and *the role of state and local governments and other organizations. The result would be a more efficient, open and reliable decommissioning process...* By incorporating changes into regulation, the NRC believes the transition from operation to decommissioning can become *more efficient and effective for both the agency and the licensee, as well as more open and transparent for the public.* [emphasis added]

We applaud NRC's intentions to be more open and transparent, and invite the NRC to begin now, by granting this extension request for a full 90 days so that the concerned and impacted public can participate fully without having to sacrifice either our family holidays or our effectiveness in participating in this landmark rule.

Sincerely,

Tim Judson, Executive Director  
Nuclear Information and Resource Service  
Takoma Park, MD

Donna Gilmore  
SanOnofreSafety.org  
San Clemente, CA

Chris Williams  
VT Citizen Action Network  
Hancock, VT

David Kraft  
Nuclear Energy Information Service  
Chicago, IL

Jessica Azualy, Program Director  
Alliance for a Green Economy  
Syracuse, NY

Thomas P. Rielly  
Vista 360  
Libertyville, IL 60048

Leslie Sullivan Sachs  
Safe and Green Campaign  
Brattleboro, VT

Judy Treichel, Executive Director  
Nevada Nuclear Waste Task Force  
Las Vegas, Nevada

Barry J White  
Citizens Allied for Safe Energy, Inc.  
Miami, FL

Paula Gotsch  
Grandmothers, Mothers and More for Energy Safety (GRAMMES)  
P.O. Box 923, Normandy Beach, NJ 08739

Susan H. Shapiro, Esq  
Indian Point Safe Energy Coalition:  
Nanuet, New York

Glenn Carroll, Coordinator  
Nuclear Watch South  
Atlanta, Georgia

Jane Williams, Executive Director  
California Communities Against Toxics  
Rosamond, CA

Dorah Shuey  
Committee to Bridge the Gap  
Ben Lomond, CA

Marylia Kelley, Executive Director  
Tri-Valley CAREs  
Livermore, CA

Mary Beth Brangan & James Heddle  
Ecological Options Network, EON  
Bollinas, CA 94924

Bruce Ferguson  
Catskill Citizens for Safe Energy  
Fremont Center, NY 12736

Michael Chojnicki, President  
Sullivan Alliance for Sustainable Development  
Narrowsburg, NY 12764

Dr. Lewis Cuthbert  
Alliance for a Clean Environment  
Pottstown, PA