

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Wednesday, December 23, 2015 3:37 PM
To: Rulemaking1CEm Resource
Subject: Comment on ANPR-26, 50, 52, 73, and 140 - Regulatory Improvements for Decommissioning
Attachments: NRC-2015-0070-DRAFT-0010.pdf

DOCKETED BY USNRC—OFFICE OF THE SECRETARY

SECY-067

PR#: ANPR-26, 50, 52, 73, and 140

FRN#: 80FR72358

NRC DOCKET#: NRC-2015-0070

SECY DOCKET DATE: 12/14/15

TITLE: Regulatory Improvements for Decommissioning Power Reactors

COMMENT#: 011

Hearing Identifier: Secy_RuleMaking_comments_Public
Email Number: 1456

Mail Envelope Properties (6c10490c30634f71b26b91d70bebb770)

Subject: Comment on ANPR-26, 50, 52, 73, and 140 - Regulatory Improvements for Decommissioning
Sent Date: 12/23/2015 3:36:48 PM
Received Date: 12/23/2015 3:36:49 PM
From: RulemakingComments Resource

Created By: RulemakingComments.Resource@nrc.gov

Recipients:
"Rulemaking1CEM Resource" <Rulemaking1CEM.Resource@nrc.gov>
Tracking Status: None

Post Office: HQPWMSMRS03.nrc.gov

| Files | Size | Date & Time |
|------------------------------|-------------|------------------------|
| MESSAGE | 277 | 12/23/2015 3:36:49 PM |
| NRC-2015-0070-DRAFT-0010.pdf | | 71517 |

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

| |
|---------------------------------------|
| As of: 12/14/15 3:58 PM |
| Received: December 14, 2015 |
| Status: Pending_Post |
| Tracking No. 1jz-8mt5-7fce |
| Comments Due: January 04, 2016 |
| Submission Type: API |

PUBLIC SUBMISSION

Docket: NRC-2015-0070

Regulatory Improvements for Power Reactors Transitioning to Decommissioning

Comment On: NRC-2015-0070-0001

Regulatory Improvements for Decommissioning Power Reactors

Document: NRC-2015-0070-DRAFT-0010

Comment on FR Doc # 2015-29536

Submitter Information

Name: Avery Kintner

Address:

3305 Corte Cadiz

Carlsbad, Ca, 92009

Email: Avery.kintner@gmail.com

General Comment

I am submitting comments on the U.S. Nuclear Regulatory Commissions Advanced Notice of Proposed Rulemaking (Docket No. NRC-2015-0070) as a community member of North County San Diego and a parent of children attending Cal Poly San Luis Obispo.. I am an advocate for clean energy and sustainable practices in building and community design.I appreciate the opportunity to comment on the development of potential changes to the decommissioning process for nuclear power reactors.

First, I would like to respectfully request that NRC extend the comment period for the Advanced Notice of Proposed Rulemaking (ANPRM) for an additional 45 days, until February 18, 2016. It is my belief that the window for comment is significantly small and the notice to the broad community of stakeholders has been insufficient to provide the commission with a broad understanding of the concerns of the citizens that will be impacted by this Rulemaking and for the commu ities to be fully informed of the consequences of the Rulemaking process. An extension of the due date, will give stakeholders necessary additional time to draft and submit comments. The original comment deadline of January 4 is insufficient given the number of federal holidays that fall during the comment period. To continue with the near-term deadline will lead to challenges to the Rulemaking decision due to the timing near the holiday season.

More succinctly, given the importance of the process and the significant public impacts related to decommissioning the plants, anything less than an invitation for public comment through community news casts falls short of complete transparency in the process.

Communities that host nuclear power reactors, and neighboring communities that are at risk to potential

issues related to decommissioning, should be actively and substantially engaged in the decommissioning process from the outset. Host communities face a number of significant impacts upon reactor closure including orderly redevelopment of the site, direct and indirect economic impacts related to the loss of employee income and tax revenue, changes in emergency planning requirements and support, and other fiscal impacts related to a major shift in the local economy and employment. I strongly support more direct engagement with host communities in NRCs decommissioning and closure process.

Section V of the ANPRM entitled Specific Considerations asks whether the current role of stakeholders in the decommissioning process should be expanded or enhanced, and how so? The response from communities that host nuclear facilities is a resounding yes. A way to expand engagement is through the establishment of a host community decommissioning task force to advise NRC on community impacts before, during, and after reactor closure. While the ANPRM acknowledges that for most decommissioning sites, state and local governments are involved in an advisory capacity (as part of a Community Engagement Panel for instance), there is no requirement under current NRC regulations that these advisory panels be formed. As NRC examines potential changes to current regulations, mandating these panels would be an appropriate step toward ensuring local community engagement.

Lastly, it is critical to convey the fiscal responsibility of decommissioning to affected communities, including a clear description of the long-term obligations to be borne by the utility companies that have benefitted from the operation of these facilities and should have been building significant reserves for decommissioning them. These funds should be clearly quantified and communicated to the public. The funding needs to be set aside in a controlled account for the sole purpose of funding the decommissioning process and the long-term environmental mitigation of residual material. Use of these funds for any other purpose places the public at risk of bearing a burden that was never theirs to begin with.

Thank you for the opportunity to comment on the U.S. Nuclear Regulatory Commissions Advanced Notice of Proposed Rulemaking on Regulatory Improvements for Decommissioning Power Reactors (Docket No. NRC-2015-0070).