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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0272

Assessment of Radioactive Discharges in Ground Water to the Unrestricted Area at Nuclear Power Plant Sites

**Comment On:** NRC-2015-0272-0002

Assessment of Radioactive Discharges in Ground Water to the Unrestricted Area at Nuclear Power Plant Sites; Request for Comment on Draft Regulatory Guide

**Document:** NRC-2015-0272-DRAFT-0008

Comment on FR Doc # 2015-31254

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## General Comment

NRC Docket ID - 2015-0272 Draft Regulatory Guidance -

The proposed Draft Regulatory Guidance as currently written, appears to exclusively benefit NPP Licensees, contractors and subs, industry insiders, by forming an overly-lenient, and a careless guidance approach for use in assessing abnormal, inadvertent radioactive releases, that may result in discharges of contaminated groundwater from subsurface to unrestricted areas at commercial nuclear power plant sites.

From a public stakeholder's perspective, the proposed draft Regulatory Guidance provides no technical assurances, protective measures, or industry accountability that should require Licensees to fully demonstrate that radioactive discharges to groundwater were not caused by contractor's (retained by Licensee) negligence, or failure to apply all best engineering practices, modern real time monitoring, and best available control technology (BACT), to prevent radioactive discharges to groundwater from occurring in the first place, or containment systems to capture, remove and transport contaminated discharges, if such were to be allowed to occur, either inadvertently or otherwise, normal or abnormal radioactive releases to groundwater.

From a stakeholder's perspective, it appears obvious the proposed Draft Regulatory Guidance only reflects views from nuclear industry experts, industry insiders, and industry experts in legal matters to minimize potential exposure to legal liabilities which may be caused by damages to groundwater, or agency failure to fully apply mandates for protection of public health and safety.

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Add = F. O'Donnell (EXD)  
T. Johnson (TSN)

The proposed Draft Regulatory Guidance fails to reflect credible criticisms articulated by technical experts and health professionals outside the nuclear industry, regarding methods necessary to be applied in credible risk assessment of contaminated groundwater discharges. .

Based upon the apparent public health and safety breaches, and the apparent degradation of highly valued public safety margins, public stakeholders hereby assert the proposed Draft Regulatory Guidance is a grossly unacceptable method to assess abnormal, inadvertent radiological releases that may result in discharges of contaminated groundwater from subsurface to unrestricted areas at commercial nuclear power plant site(s) in United States.

Stakeholders also note that during preparation of this proposed Regulatory Guidance document, there does not appear to have been an extensive alternatives analysis, or comparison with methods applied elsewhere beyond United States, to control radioactive discharges and release of contaminated groundwater from subsurface to unrestricted areas at nuclear plants operating globally, to protect public health and safety of it's citizens.