

## **Rulemaking1CEm Resource**

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**From:** RulemakingComments Resource  
**Sent:** Tuesday, March 15, 2016 10:56 AM  
**To:** Rulemaking1CEm Resource  
**Subject:** Comment on ANPR-26, 50, 52, 73, and 140 - Regulatory Improvements for Decommissioning  
**Attachments:** NRC-2015-0070-DRAFT-0056.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:** 3/14/16

**TITLE:** Regulatory Improvements for Decommissioning Power Reactors

**COMMENT#:** 057

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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0070

Regulatory Improvements for Power Reactors Transitioning to Decommissioning

**Comment On:** NRC-2015-0070-0007

Regulatory Improvements for Decommissioning Power Reactors; Extension of Comment Period

**Document:** NRC-2015-0070-DRAFT-0056

Comment on FR Doc # 2015-32599

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## Submitter Information

**Name:** Heather Lightner

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## General Comment

March 10, 2016

Nuclear Regulatory Commission  
Secretary, U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attn: Rulemaking and Adjudications Staff

Re: Advance Notice of Proposed Rulemaking; Regulatory Improvements for Decommissioning Power Plants  
(Docket ID NRC-2015-0070)

Concerned Neighbors of Pilgrim submits the following comments regarding the above-referenced Notice of Proposed Rulemaking.

EP-2: Rulemaking may involve a tiered approach for modifying EP requirements based on several factors, including, but not limited to, the source term after cessation of power operations, removal of fuel from the reactor vessel, elapsed time after permanent defueling, and type of long-term onsite fuel storage.

Question EP-2: (a) What tiers and associated EP requirements would be appropriate to consider for this approach?

(b) What factors should be considered in establishing each tier?

(c) What type of basis could be established to support each tier or factor?

While the chance of a radiologic emergency decreases once a reactor has ceased operation the risk of a catastrophic event cannot be eliminated. Emergency planning should continue throughout the decommissioning lifecycle, and as long as spent nuclear fuel is stored onsite. Spent fuel pools (SFP) will continue to pose a risk of zirconium fire due to a beyond-design accident or terrorist attack involving a major loss of water with subsequent radioactive release. Until all spent fuel has been successfully transferred to dry cask storage and stored at an independent spent fuel interim storage (ISFSI) facility, the risk of a zirconium fire cannot be eliminated and must be considered with regard to emergency planning.

The process of transferring spent fuel to dry cask storage also presents a risk. Should a canister be dropped during the transfer process it could damage the floor or wall of the spent fuel pool, causing a loss of water. Radioactivity could be released directly from a drop or due to the overheating of spent fuel due to a decreased water supply in the SFP.

A terrorist attack on an ISFSI also poses the possibility for a release of radioactive material, either through one or both of the following processes: mechanical dispersion of fuel particles or fragments or dispersion of radioactive aerosols (such as cesium-137). Although the probability is low that a terrorist attack could be carried out on an ISFSI, causing a subsequent release of radioactivity, the threat cannot be ruled out, and should be addressed by continued emergency planning indefinitely.

Reactors that shut down should be required to maintain formal offsite radiological emergency preparedness, including at least a 10-mile emergency planning zone and alert/notification systems, until any and all radiological waste is shipped offsite to a repository. Before any waivers or relaxed standards are allowed, dry casks stored on site should at least meet additional safeguards against climate change impacts (especially for those ISFSIs located in vulnerable coastal zones) and terrorism.

Heather M. Lightner  
President  
Concerned Neighbors of Pilgrim  
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## **Attachments**

ANPR comments Concerned Neighbors of Pilgrim

March 10, 2016

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