

Rulemaking1CEm Resource

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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-0060

Comment on FR Doc # 2015-32599

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General Comment

The inadequacy of current decommissioning rules has been revealed since "merchant plants" have begun closing. Thank you for recognizing that the rules need to change. Please, accept these comments from this citizen, who has followed nuclear policy since the 1980s. I live in Brattleboro, Vermont and am following the decommissioning of Vermont Yankee closely by attending meetings, as well as writing and publishing on the issues.

Owners like Entergy exploit SAFSTOR to avoid compliance with regulations and defer cleanup for decades. The result is that workers who know the reactor aren't on the job, and as we know many modifications are made to plants over their operational lifespan. The environment is at risk of more contamination over time with SAFSTOR, and local economic planning must be deferred. Decommissioning should begin at the earliest possible date determined by worker and community safety. SAFSTOR should be based on environmental science and nuclear engineering, not lack of funding in decommissioning funds. 20 years should be plenty of time for a reactor to be in SAFSTOR, and I ask the NRC to put that time limit on all SAFSTOR applications.

The PSDAR should be required to include site-specific planning with detailed independent site surveys at the reactor to be decommissioning - not cookie-cutter plans. The NRC should change the PSDAR to a permit; it should not simply be a planning document.

Citizens living in the evacuation zones of closed reactors deserve full hearing rights before the NRC on the

PSDAR/permit. We who live in the region impacted more than any other stakeholders. The NRC should require hearings near the site, during which formal testimony is taken. Host states and towns in the evacuation zones should receive decommissioning funds, so that advisory panels can hire independent technical advisors and receive training. An NRC liaison to the Community Advisory Board should be mandatory.

NRC lets Entergy use Yankee decommissioning trust funds for nuclear waste management and storage, property taxes, and lobbying, among other things not in the current rules but are granted as exemptions. These rules were put in place for a reason, and this practice must stop. The NRC should make it much harder for licensees to receive exemptions.

The National Environmental Policy Act was required in the past, which made decommissioning a Major Federal Action requiring EPA involvement and meaningful oversight. NEPA should be reinstated.

Finally, and of equal importance, decommissioning trust funds should include funding for oversight by the state. States must have the resources and authority to regulate pollution within their borders, and of the decommissioning funds that impact taxes and host communities economic development.