

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Monday, March 21, 2016 6:42 PM
To: Rulemaking1CEm Resource
Subject: FW: Docket ID NRC-2015-0070; Regulatory Improvements for Decommissioning Power Reactors
Attachments: SWRPC - Comments - Signed - Docket ID NRC-2015-0070.PDF
Importance: High

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: 3/18/16

TITLE: Regulatory Improvements for Decommissioning Power Reactors

COMMENT#: 103

From: Rebeckah Bullock [mailto:rbullock@swrpc.org]
Sent: Friday, March 18, 2016 2:25 PM
To: RulemakingComments Resource <RulemakingComments.Resource@nrc.gov>
Cc: tmurphy@swrpc.org
Subject: [External_Sender] Docket ID NRC-2015-0070; Regulatory Improvements for Decommissioning Power Reactors
Importance: High

Hello,

Please find attached comments on Docket ID NRC-2015-0070; Regulatory Improvements for Decommissioning Power Reactors from Southwest Region Planning Commission.

Please let us know if you have any questions regarding this submission.

Sincerely,
Rebeckah

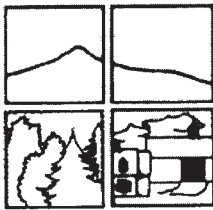
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March 18, 2016

Secretary

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

RE: **Docket ID NRC-2015-0070**; Regulatory Improvements for Decommissioning Power Reactors

To Whom It May Concern:

We have reviewed the Proposed Rules notice relative to 10 CFR Parts 26, 50, 52, 73, and 140 as published in the Federal Register (Vol. 80, No. 223, November 19, 2015). On behalf of Southwest Region Planning Commission, please accept the following comments on the U.S. Nuclear Regulatory Commission's (NRC) Advanced Notice of Proposed Rulemaking.

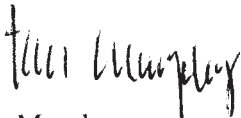
- In reviewing the proposed rules, it becomes apparent that the referent is heavily weighted on nuclear science and safety as it relates to the decommissioning process. Our experience is that there are other dimensions to the closure and decommissioning of a nuclear power facility that should be factored into the rulemaking. In particular, community development and socioeconomic variables are significant and should be prominently considered in rulemaking.
- The proposed rules appear to be devoid of any perspective relative to the nuclear host community's challenge to maintain socioeconomic integrity during the decommissioning process. From our perspective, this is a serious flaw in that overall community health and integrity is closely tied to socioeconomic health. Why would the principles of social science not be as significantly relied upon in the rulemaking process as those of nuclear science?
- If the intent of the rulemaking process is at least in part about producing more comprehensive rules for the decommissioning process, it is critical that community and socioeconomic impacts also be considered. The decommissioning of a nuclear power facility often results in significant losses in employment, tax base, charitable contributions, corporate and personal participation in community affairs (social capital), and purchases of goods and services. In addition, the stigma associated with the site of a former nuclear power reactor, along with long-term on-site storage of spent fuel, can result in disinvestment in community development initiatives resulting in blight over time.
- In the proposed rules, it is revealed that the decommissioning timeframe of 60 years is based on the half-life of cobalt-60 as well as the expectation of institutional controls to be maintained (V., E, Reg-1, c.). This approach prolongs the period of disinvestment and stigma associated with the site of a former nuclear power reactor while increasing the risk of blight developing in the host community. This phenomenon may be particularly prominent in rural areas where disinvestment

in community development activity not only impacts the host community, but also surrounding areas resulting in regional impacts.

- The residual contamination associated with the site of a former nuclear power reactor during a prolonged decommissioning process extends beyond the predominant isotopes remaining at the facility. The closure and decommissioning of a nuclear power facility should also be viewed as introducing significant “contamination” of the socioeconomic conditions of the host community and surrounding region.
- So rather than 60 years, an alternative point of view for establishing the period of decommissioning is to base the timeframe so as to minimize negative community and socioeconomic impacts including losses in employment, tax base, local spending, and other associated disinvestment. Through this lens, the appropriate timeframe for decommissioning would be much shorter (e.g., within five years).
- It is critical for nuclear power facility host communities and surrounding regions to have a voice in the process of closure and decommissioning of such facilities. To the extent possible, active dialogue should be encouraged by public boards, committees, and/or other appropriate entities well in advance in order to better understand and assess the impacts of closure and decommissioning.
- Funding intended for use to decommission a nuclear facility, such as a decommissioning trust fund, should: a) consider as part of the overall closure and decommissioning process the need to adequately understand, assess and mitigate socioeconomic and community development impacts and, therefore, a portion of this funding should be made eligible for this purpose by local governments, regional economic development/planning groups and/or other appropriate entities; and b) not be used to fund activities which are not otherwise directly related to the closure and decommissioning process in order to facilitate prompt decommissioning.

Thank you for the opportunity to provide comment. If you have questions or would like to discuss, please feel free to contact me.

Sincerely,



Tim Murphy
Executive Director