

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Thursday, March 24, 2016 6:23 PM
To: Rulemaking1CEm Resource
Subject: Comment on ANPR-26, 50, 52, 73, and 140 - Regulatory Improvements for Decommissioning
Attachments: Comment from Carpenter on behalf of Cape Downwinders.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: 3/22/16

TITLE: Regulatory Improvements for Decommissioning Power Reactors

COMMENT#: 127

As of: 3/22/16 9:07 AM
Received: March 17, 2016
Status: Pending_Post
Tracking No. 1k0-8ojy-780m
Comments Due: March 18, 2016
Submission Type: Web

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-0089

Comment on FR Doc # 2015-32599

Submitter Information

Name: Susan Carpenter

Address:

45 Riverdale South

South Dennis, MA, 02660-3301

Email: scarpenter1103@gmail.com

General Comment

See attached file(s)

Attachments

Decommissioning Nuclear Power Reactors

COMMENT ON PROPOSED REGULATORY IMPROVEMENTS FOR DECOMMISSIONING NUCLEAR POWER REACTORS

My name is Susan Carpenter. I am the secretary of Cape Downwinders, Cape Cod, MA. I am submitting these comments as a concerned citizen living downwind of the Pilgrim Nuclear Power Station.

Deb Katz of Citizens Awareness Network cites four concerns resulting from deregulation of the decommissioning of nuclear reactors:

- No detailed plans are required
- It is no longer considered a major federal action
- There are no mandatory on-site resident NRC inspectors
- There is limited oversight.

Adequate funding should be available at the time of decommissioning. The nuclear decommissioning trust funds are not the property of the owners of the plants, they are the property of the customers. According to the Utility Decommissioning Tax Group, "They are outside the electric utility's control. In bankruptcy situations, for example, decommissioning trust funds cannot be used to satisfy creditors' claims." The trust fund should be used for decommissioning only, not for property taxes, storage of waste, lobbying, emergency planning, legal fees, or other expenses not directly related to decommissioning. The NRC should not grant exemptions for other uses. Any shortfalls in funds will be borne by the ratepayers of the states as well as by the taxpayers.

Each nuclear reactor is unique. Plants differ by design and by operational history. Thus there should be no one-size-fits-all plan for their decommissioning. Keeping long-term staff on site assures that issues specific to that plant are taken into consideration.

Due to the longterm hazards posed by the radioactive waste involved, decommissioning should be compliant with federal regulations. The National Environmental Policy Act should be applied to post-closure activities and the Environmental Protection Agency should also oversee the process.

Communities surrounding these sites must have adequate input into the decommissioning plan. The NRC rule changes require only one public meeting. This is insufficient considering the magnitude of the issue. States where these reactors are located must be allowed to regulate decommissioning which ultimately results in the creation of a long-term radioactive waste dump.

According to Paul Gunter of Beyond Nuclear, “The potential vulnerabilities of spent fuel pools to terrorist attacks are plant-design specific. Therefore specific vulnerabilities can be understood only by examining the characteristics of spent fuel storage at each plant.” For example, Pilgrim Nuclear Power Station was designed for eight hundred and eighty spent fuel assemblies but currently holds over twenty-two hundred. A fire in the pool whether caused by human actions or as a result of overcrowding could devastate large areas of Massachusetts and surrounding states.

Once the plant is closed, the fuel assemblies in wet storage should be given high priority and moved to hardened dry cask storage. SAFSTOR allows up to sixty years to complete this task. This allowable delay is anything but safe. Throughout the decommissioning there should be adequate NRC oversight, the Emergency Planning Zone should be increased to a fifty mile radius, and radiation monitoring be given a high priority. Because the plant is not producing electricity does not mean the danger has passed. During this time, site-specific advisory boards must be formed and allowed input into the process. Public input assures a democratic process.

Respectfully submitted,

Susan Carpenter
45 Riverdale South
South Dennis, MA 02660-3301
scarpenter1103@gmail.com
774-268-1695