

## **Rulemaking1CEm Resource**

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**From:** RulemakingComments Resource  
**Sent:** Friday, March 25, 2016 2:37 PM  
**To:** Rulemaking1CEm Resource  
**Subject:** Comment on ANPR-26, 50, 52, 73, and 140 - Regulatory Improvements for Decommissioning  
**Attachments:** Comment from Kosterman.pdf

### **DOCKETED BY USNRC—OFFICE OF THE SECRETARY**

**SECY-067**

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**FRN#:** 80FR72358

**NRC DOCKET#:** NRC-2015-0070

**SECY DOCKET DATE:** 3/22/16

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

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# PUBLIC SUBMISSION

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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-0121

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## Submitter Information

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## General Comment

We have serious concerns regarding the decommissioning of Vermont Yankee Nuclear Plant in Vernon, VT and VY's dismantling of the 10 mile Emergency Planning Zone (EPZ). Many State of Vermont officials, as well as Massachusetts towns in our area, have voiced their concerns, and written letters and resolutions, opposing Vt. Yankee's elimination of the 10 mile EPZ. They also oppose VY increasing the present notification time for an accident at VY from the present 15 minutes to 60 minutes. These safeguards and real time monitoring of VY will cease April 2016. We believe that the EPZ and all safeguards presently in existence should continue.

Even though VY shut down, the threat to public safety did not end, in fact it may have increased. The temporary spent fuel pool is now holding 5 times the amount of high-level radioactive waste than it was designed to hold, and it will remain in the storage pool at least until 2020, at risk of fire and catastrophic radioactive release. There is over 900 tons of highly radioactive fuel, stored in a pool on top of a 7 story building, covered with a thin metal roof. We believe that until all of the highly radioactive fuel is moved from the over-packed fuel pool into dry cask storage, the EPZ needs to be maintained and we need to receive sufficient notification time in case of an accident. Moving the fuel into storage is dangerous and we need to be protected!

With VY downsizing its staff, is there enough security and oversight to protect citizens from terrorist threats? And if we lose power due to severe weather, or if the grid goes down for any other reason, will the back-up

generators be sufficient to cool the spent fuel to ensure public safety? These questions are important to consider especially after 9/11 and Fukushima plant that was the same Mark 1 Boiling Water Reactor as VY. When the disaster happened in Fukushima, the US government advised US citizens to evacuate if they were within 50 miles, in part because of concern about Fukushima' spent nuclear fuel. So you do not need to live within the 10 miles EPZ to be affected by an accident at VY. There are close to 3,000 spent fuel rods 3 million curies of highly radioactive spent fuel in the temporary spent fuel pool at VY. Hiroshima was only 2,000 curies!

Continued staff downsizing at VY could potentially contribute to "faulty calculations" and problems at VY, as we have seen when the plant shut down on Dec. 30, 2014. This and the fact that VY has had numerous leaks, discoveries of underground pipes, and other discrepancies in the past are very worrisome to those of us who live in the area. During decommissioning is not the time to downsize staff and security. In fact security should be increased so the public would be protected from outside threats, weather-related disasters, and "faulty calculations". Public safety should be the number one concern during decommissioning, and the public needs to be protected!

Due to the fact that we have family, friends, neighbors, former and present students living in the Tri-State area, and to ensure the safety and well-being of all citizens within 10 miles of VY and beyond, we are requesting that the EPZ be maintained, the 15 minute notification time continue, and for real time monitoring to continue.

We believe that we deserve a public hearing on the elimination of the EPZ, as there has not been one. We live in the area to be impacted and deserve to be able to express our concerns. Also, we deserve to be protected and have the current workforce maintained, not cut, so public safety is not jeopardized. In addition, there should be state oversight of the decommissioning process to ensure that it is done properly. This should include Vermont, Massachusetts and New Hampshire. There should be continued NRC inspections and oversight. Where is the accountability? Inspections should be unannounced, plus there should be a liaison to the Community Advisory Board. This should be mandatory. We sincerely appreciate anything you can do to make these "common sense" requests a reality to protect the citizens of Massachusetts, Vermont and New Hampshire!

Sincerely,  
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