

Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Friday, March 25, 2016 3:54 PM
To: Rulemaking1CEm Resource
Subject: Comment on ANPR-26, 50, 52, 73, and 140 - Regulatory Improvements for Decommissioning
Attachments: Comment from Hoffman.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#: 157

As of: 3/22/16 11:04 AM
Received: March 18, 2016
Status: Pending_Post
Tracking No. 1k0-8okr-x2eq
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-0126

Comment on FR Doc # 2015-32599

Submitter Information

Name: Ace Hoffman

Address:

POBox 1936

Carlsbad, CA, 92018

Email: rhoffman@animatedsoftware.com

General Comment

To Whom It May Concern,

Decommissioning nuclear power plants is a fiasco. Some reactors are entering a third 20-year operating period, and yet they still haven't been able, in the first 40 years, to fully fund their decommissioning accounts.

This is clearly intentional: The lack of funds is used again and again by utilities around the country (and around the world) to justify continued operation of the nuclear power plant, specifically to further fund their own decommissioning.

This is penny-wise and many pounds of radioactive fission products foolish!

Especially because it is unquestionably true that numerous reactors would close today if their decommissioning funds -- which have been growing for three decades or more -- were fully funded.

Furthermore, a so-called "decommissioned" reactor these days is still a very dangerous thing, since invariably the spent nuclear fuel remains on site. The maximum size of the catastrophe that can occur at a closed nuclear reactor is nearly as large as at an operating reactor. Surely the NRC knows this, there is no way they don't. But with the statistical garbage known as a "P.R.A." (Probabilistic Risk Assessment) the NRC and the nuclear industry pretend that the dangers have significantly subsided: Fire brigades that were kept near the reactor

when it was operating are nowhere to be found for a "decommissioned" reactor, yet a spent fuel pool drain-down and subsequent fire, or a dry cask fire (perhaps following an airplane strike, accidentally or by a terrorist) would be every bit as catastrophic as Chernobyl or Fukushima was. Maybe worse: There are more than 30 refueling cycles stored at San Onofre. If all were destroyed in an earthquake or other catastrophic event, far more radiation would be released than an operating reactor contains. What would be missing would be the short-lived radioactive products, but fission products with approximately 30-year half-lives would flood the environment, along with hundreds of longer-lived isotopes.

Yet security and fire protection are both significantly reduced at so-called "decommissioned" reactor sites!

It's time to fully fund nuclear reactor decommissioning plans: And as costs keep rising, fund them more. It's likewise time to close the reactors, lest an unaffordable accident happen first, and because there's no benefit in increasing the pile of nuclear waste at any nuclear site.

There is no cost-effective solution to the long-term safety problems created by nuclear power, but the less high-level waste there is to guard, the better. Canisters get old, cracks develop, and costs go up. There is no stopping that progression ("rust never sleeps"), and current approved dry casks, made of so-called "stainless" steel just 1/2 to 5/8th inch thick, are planned to fail, on the assumption they will be moved somewhere that doesn't exist some time before they fail. But that plan has no future, and the time it will take before failure may be far less than the NRC and the nuclear industry assumes.

Ace Hoffman
Carlsbad, California
March 18th, 2016

The author has been studying nuclear power for many decades.