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Docket: NRC-2015-0070

Regulatory Improvements for Power Reactors Transitioning to Decommissioning

Comment On: NRC-2015-0070-0178

Regulatory Improvements for Power Reactors Transitioning to Decommissioning; Request for Comment on Draft Regulatory Basis

Document: NRC-2015-0070-DRAFT-0227

Comment on FR Doc # 2017-05141

Submitter Information

Name: Anonymous Anonymous

General Comment

Docket ID NRC-2015-0070, Regulatory Improvements for Power Reactors Transitioning to Decommissioning

Attachments

Comments-Docket-ID-NRC-2015-0070

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June 13, 2017

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Docket ID NRC-2015-0070, Regulatory Improvements for Power Reactors Transitioning to Decommissioning

Dear Kristine L. Svinicki, Jeff Baran, and Stephen G. Burns,

Thank you for considering the following comments on the proposed rule document titled “Regulatory Improvements for Power Reactors Transitioning to Decommissioning” to “support a draft regulatory basis to support a rulemaking that would amend NRC's regulations for the decommissioning of nuclear power reactors.”

Foreign Ownership, Control, or Domination (FOCD) Exemptions for Facilities in Decommissioning

No, the NRC should not grant exemptions from this requirement for facilities that have been dismantled and removed, such that only independent spent fuel storage installations remained onsite.

Potential Changes to 10 CFR Part 37

In response to all four questions, my reply is “no,” since according to your own document titled “Category of radioactive sources”:

Category 1 sources, if not safely managed or securely protected, would be likely to cause permanent injury to a person who handled them or was otherwise in contact with them for more than a few minutes.

Category 2 sources, if not safely managed or securely protected, could cause permanent injury to a person who handled them or was otherwise in contact with them for a short time (minutes to hours).

Specific Questions Regarding Appendix F, “Decommissioning Trust Funds,” of the Draft Regulatory Basis

We need:

- An independent, state agency-affiliated, transparent public oversight panel;
- State legislation that creates transparent fiscal accountability, requires annual audits and retention of a project auditor, and makes detailed information available for public examination;
- Federal legislation requiring greater transparent fiscal oversight of the decommissioning funds by requiring hiring of an auditor and annual audits, and licensee adherence to US standard accounting practices & principles.

Onsite and Offsite Liability Insurance During Decommissioning

No, NRC should not establish regulations for licensees in decommissioning to preclude the need for these licensees to request exemptions.

Specific Question Regarding Security Plan Changes During Decommissioning

Option 1: No change.

Comment: Yes, no change.

Request for Comment: Specific Question Regarding the Community Advisory Board (CAB)

Democracy itself is a compelling basis for a community advisory board. Further, public health and safety is a human right, not a cost-justified requirement.

Cumulative Effects of Regulation

All interim nuclear waste storage “solutions,” particularly spent fuel pools, are vulnerable to various harms—including malfunction, natural disaster, and terrorist or cyber-attack. This material is one of the most hazardous substances on earth, and yet, the cumulative effects of this rule seem destined to reduce your purview from the realm of regulation to one of merely guidance, and eliminate the hearing rights of the public or states to participate in this matter of vital interest.

Plain Writing

As to the request for comments regarding whether this document complies with the Plain Writing Act of 2010, and the Presidential Memorandum, “Plain Language in Government Writing,” published in the Federal Register on June 10, 1998 (63 FR 31883), to my eye or ear, the NRC has not yet reached that goal.

Sincerely,

Lissa Kiernan

Author, *Glass Needles & Goose Quills, Two Faint Lines in the Violet*
Consultant, Memorial Hospital for Cancer and Allied Diseases