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Draft Letter to the Nuclear Energy Institute Regarding the Clarification of Regulatory Paths for Lead Test Assemblies

Comment On: NRC-2018-0109-0002

Draft Letter to Nuclear Energy Institute Regarding Clarification of Regulatory Paths for Lead Test Assemblies

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General Comment

I strongly object to the proposed changes on the regulation of ATFs. Of course the proposal appeals to the nuclear industry--it lets them off the hook of regulation and accountability. What fox doesn't want free access to the hen house? But regulation is supposed to check the predictable corporate urge to cut corners for profit, at public expense. This proposal would constitute a sea change in regulatory procedure, one that betrays the public trust.

My home in Plymouth, Massachusetts is less than 5 miles from Pilgrim Nuclear Power Plant the sole plant to remain in the NRC's Category 4, just above forced closure. We already live in terror because Pilgrim, six years' beyond its supposed retirement, is not just decrepit but a nightmare of poor management. Don's Johnsons internal letter of December 2016, accidentally copied to people in our community, detailed its "lax safety culture. Among nuclear plants, Pilgrim is a leader in "Accident Sequence Precursor (ASP) events--such as might help predict a Fukushima or a Chernobyl--with at least four such events in the past ten years, and at least fifteen since startup. We can only imagine the operators of Pilgrim being given license to experiment with heaven knows what new fuel concoctions--without oversight or accountability. What could go wrong? What could you be thinking?

I urge you to consider each of the points made by Harold Chernoff. The draft proposes a radical reinterpretation and/or revision of the regulatory history of model TS 4.2.1., contrary to all wisdom and precedent. It advances a faulty analysis of the requirements in 10 CFR 50.59 for use of LTAs, and an interpretation of the need for exemptions from 10 CFR 50.46 that is at odds with all prior history of exemption protocol. Such a radical proposal should at the very least be subject to substantial public notice and to a sufficient comment period, prior to implementation, consistent with the Administrative Procedure Act and the Atomic Energy Act. This last-minute opportunity for the public to comment is insufficient for a

subject this urgent.

Given the Trump administration's memo of intention to the DOE to bail out coal and nuclear plants (with Pilgrim specifically mentioned, p. 16), we in Plymouth are already on edge. This new NRC proposal, clearly designed to streamline cost-cutting measures, puts things in a much more threatening perspective. Please, NRC, get a grip. We're not talking about a faulty airbag that could jeopardize the lives of a few people. No, we're talking about regulatory changes that could lay waste to thousands of miles and threaten the survival of large urban populations, if something goes wrong. And something always goes wrong. Surely you must know that it's not a matter of if, but of when.

Please don't betray the public trust. Reject this draft proposal.