

PUBLIC SUBMISSION

As of: 9/24/19 8:30 AM
Received: September 23, 2019
Status: Pending_Post
Tracking No. 1k3-9ccm-qq2g
Comments Due: October 09, 2019
Submission Type: Web

Docket: NRC-2019-0063

Criteria to Return Retired Nuclear Power Reactors to Operations

Comment On: NRC-2019-0063-0003

Criteria to Return Retired Nuclear Power Reactors to Operations

Document: NRC-2019-0063-DRAFT-0022

Comment on FR Doc # 2019-15934

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General Comment

The NRC is charged with ensuring public safety in all things nuclear. However, when a nuclear plant is closed for economic reasons, current rules make it improbable or impossible for it to make power again when economic conditions change. Considering the effects of climate change, it does not serve public safety for NRC to make rules that prevent licensed, well-operating nuclear plants from taking a hiatus from power production and then returning to power production. Current NRC rules for returning a plant to operation do NOT serve public safety. The rules only serve the economic rivals of nuclear energy.

The NRC has not been charged with the duty of helping non-nuclear technologies compete economically. Yet that is what the existing rules do---current rules make sure shut-down nuclear plants stay shut-down. In my career, I was a specialist in issues of corrosion chemistry, including corrosion prevention at nuclear plants. There is no reason that a nuclear

plant can't be in safe lay-up and then restarted. Many non-nuclear plants go off-line for various periods of time and are then restarted. Nuclear plants could do the same.

Please reset the "return to operation" rules for nuclear plants in line with scientific and engineering data. Do not let those rules be set as an economic incentive to shut down nuclear plants and encourage other types of plants instead. That is not the job of NRC. Please revise your criteria for returning nuclear plants to service, as described in this proposed rule.