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"Generic Rulemaking to Improve Nuclear Power Plant Licensing"

This proposal will solve no problems that impact nuclear power. It will simply make it easier to license power plants while these problems, from alternate sites through uranium supply to nuclear waste, remain unsolved. I am very uncomfortable with such an approach. With all due respect, it seems backwards. Wouldn't it be sounder to try to solve the problems and resolve the questions first, and then let licensing proceed if the solutions and answers found warrant licensing?

It seems to me the nuclear industry has been built on promises that have yet to be kept. The rules seem to have been made to promote nuclear energy, assuming the problems would be solved soon and simply. Twenty years and about 100 billion dollars later, I feel nuclear power may be a technological Vietnam. The solutions have yet to catch up to the problems, but the public is told the solution is to pour in more money and keep on doing as we have done, i.e. by licensing new nuclear power plants without solutions for their problems either.

It would be extremely difficult, if not impossible, to make a general rule on most nuclear issues anyway. The failure of the Rasmussen Report makes that clear. The environment is complex and different in different places. No human rule can override this fact. Instead of pressing ahead with overlay broad "rules" that will likely be unworkable, unsound, and inappropriate in many cases, why don't we concentrate on solving the problems nuclear energy has? A new set of rules won't affect the price of uranium, the health effects of radon, or the disposal of nuclear waste.

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Because generic rules tend to foreclose issues without considering specific local conditions, they are inherently undemocratic. Thus, enacting such rules will only increase public distrust of the NRC. This distrust is based in large part on the NRC's past "damn the problems, full speed ahead" attitude. Acknowledged by card.....

Please remember that you are the Nuclear Regulatory Commission, not the Nuclear Licensing Commission. Your job is to protect the public, to control nuclear energy and its dangerous ~~xxxxx~~ products. If you try to promote nuclear energy through generic rules which attempt to override reality, you risk falling into the same trap the AEC did. In fact, that may be the problem: While the AEC name was abolished, many of the NRC people were AEC people, and they seem to have the same nuclear-promoting attitude. This is a dangerous course. The nuclear industry has been walking on a quicksand of unsolved problems for too long. I think it is time for the NRC to say: Solve your problems or stop where you are. The known "costs" of such a stoppage are not readily compared with the "benefits" of avoiding or reducing unknown dangers. What amazes me is how the NRC has run so far into the unknown without reckoning the possible risks and costs realistically.

In sum, I think you should scrap this generic rulemaking idea. It will waste staff time much better devoted to solving the problems that nuclear power has. Generic rules will be very difficult to develop, most likely unrealistic, and will cause more problems than they can solve. Among the problems caused are: continuing nuclear development on an ~~xxx~~ unsound basis with many unsolved problems; likelihood of having to reverse decisions later because they are based on unrealistic general rules; and a further increase in public distrust of the NRC. Please set your house in order and stop trying to be a promotional agency. Your job is to regulate, yes. But regulatory efficiency is based on realistic work. It is folly to think that a general rule, which makes the paperwork simpler, really solves the problem of nuclear waste, or uranium supply, or safety questions, etc. If you simplify licensing without solving any problems, you risk the licensee's whole investment should the problem not be solved. Thus such generic rules are unsound for everybody. I could submit a point-by-point critique of the proposed rules, but unless you're willing to listen to this, that would be a waste of time.