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USNRC

Secretary of the Commission  
Docketing and Service Branch  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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1 October, 1990

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear NRC Commissioner:

I am writing in response to proposed NUREG rules for nuclear power plant licensee extensions.

I am a PhD candidate in the Environment, Technology, and Society Program, Clark University, Worcester, MA. I have previously worked on projects related to human reliability and risk management for nuclear power plants and the transportation of high-level radioactive waste. In addition, I have been involved in projects concerning emergency response planning for chemical and nuclear facilities.

I am concerned about the proposed rule and believe that it should be rescinded for a number of reasons:

- 1) The NRC expects licensees to furnish lists of documents that comprise the basis for current reactor licensing. However, the documents themselves are not provided. Thus, the NRC will not be reviewing them and requiring that new safety and re-design features are implemented. Nor will the NRC be ensuring compliance of requirements under the existing license. Given the small numbers of NRC licensee inspectors for all facilities, perhaps this is not surprising. However, it is not sound practice to assume that licensees are in full compliance with all requirements if inspections do not take place.
- 2) Licensees are expected to identify all important issues relevant to "public health and safety or the common defense and security." The ensuing loophole is enormous! If a licensee fails to identify or document for the NRC a significant safety issue it will not violate the NRC's rule. The licensee is only in violation of the rule if it fails to notify the NRC of information concerning what it has previously identified. Thus, the licensee only need not identify an issue to avoid any violations.
- 3) Just because a facility has operated safely in the past does not mean it will continue to do so. In addition, it is negligent to allow continued operation without requiring the use of all available operating data and implementation of all available safety enhancements. However, this is the situation that will occur by allowing the renewal of licenses for 20 years before the initial license is expired. Up to an additional 20 years operating time can be allowed without due consideration of knowledge gained by the extra 20 years of operating under the current license.
- 4) The proposed rule begs the question of scientific certainty regarding the understanding of age related problems in operating reactors. Even assuming that all knowledge potentially available to date has been evaluated, operating history has been short and limited. Thus, data are limited and predictions are uncertain. We always tend to think that we know more than we actually do, and are more certain than the data really allow us to be. Such biases are well documented in the psychological literature. And empirical evidence supports these claims. The proposed rule protects licensees from having to address age related problems in the years that occur between application for a license renewal and the end of the original licensing period. A time of up to 20 years.

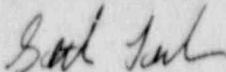
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5) Why do the regulations allow licensees to be exempt from requirements under the USI and GSI when licenses are renewed? The proposed rule would not require that commitments be implemented before a renewal is granted. Thus, licensees are free to omit the implementation of such commitments. Does not this contradict the whole idea of USI and GSI process? Assumptions about the adequacy of current bases of licenses are just that--assumptions and should only be treated as such. If the NRC was serious they would require strong evidence to ensure the validity of all claims.

I believe the proposed rule is mistaken in its intent and will not provide the results assumed. It should be withdrawn and new guidelines for license renewals be developed. Any rules should at the very least require in-depth analyses and inspections of all licensee operations and equipment to ensure future safety.

Thank you for your time.

Sincerely,



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