



DOCKET NUMBER PR 2, 50454
PROPOSED RULE (55 FR 29043)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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Mr. Samuel Chilk
Secretary of the Commission
Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Chilk,

In accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Nuclear Regulatory Commission's (NRC) proposed ruling on 10 CFR Parts 2, 50 and 54, Nuclear Power Plant License Renewal, detailed in the Federal Register, July 17, 1990.

EPA has no authority in the enforcement of NRC regulations, however, there are environmental concerns associated with nuclear electrical generation which EPA should review as required under NEPA. Nuclear power plants degrade with operation, and there may be some problems associated with long-term operation that our Agency can provide informational support. The proximity of a power plant to drinking water sources or valuable habitat communities, for example, would be necessary information in developing maintenance priorities for an aging plant. The potential for severe environmental damage due to accidents or sabotage is of primary concern to EPA. Safety of the environment and public health should have priority over economics in allowing aging facilities to continue to operate.

The proposed rule requires that the applicants for license renewal take necessary action to ensure that the plant will continue to meet an acceptable level of safety during the renewal term. The required actions would include those necessary for the effective management of age-related degradation of systems, structures, and components important to license renewal. We believe that in addition to these actions, applicants for plants in seismically active areas (e.g., California) should also conduct regional geophysical inspections/surveys to determine any changes since original licensing regarding susceptibility to detrimental effects from seismic activity and any measures that should be taken to prevent potential seismic damage of the plant.

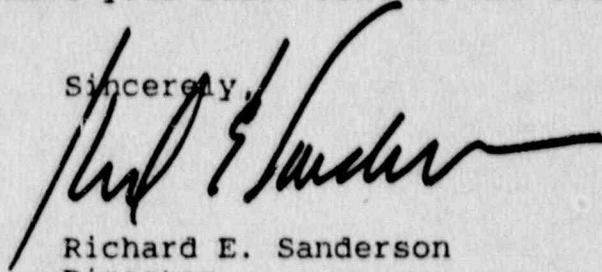
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We appreciate the opportunity to review the Nuclear Regulatory Commission's proposed ruling on license renewal for nuclear power plants. If you have any questions concerning our comments please call me or have your staff contact Ms. Susan Offerdal (202-382-5059).

Sincerely,

A handwritten signature in black ink, appearing to read "Richard E. Sanderson", written over the word "Sincerely,".

Richard E. Sanderson
Director
Office of Federal Activities

cc: EPA Regional Environmental Review Coordinators