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Bradley M. Gordon

FREELANCE JOURNALIST

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10/9/90

Dear NRC,

Regarding NUREGs 1362, 1398 & 1412, I oppose plant license extensions without plant modifications, and request that you reconsider your course of action and not enact these policies.

The NRC should not only require a list of documents which make up the current licensing basis, but the actual documents themselves. Furthermore, the NRC should review these documents to ensure that the plant requesting the license renewal at least complies with the terms of that license.

The NRC should require that the licensee comply with the commitments made under the current license prior to issuance of a renewed license. Also, since the NRC has supposedly resolved all "Unresolved Safety Issues", the NRC should require that utilities implement these resolutions prior to receiving a renewed license.

The NRC's proposed rule acts to insulate the licensee from having to address age related problems encountered in the 20 years between the application for a renewed license and the end of the original 40 year license.

The 20 year period between the application and the renewal should be used to ensure the licensee complies with the current licensing basis as it develops. The proposed rule must ensure that the plant meet the current licensing basis, ie. the licensing basis at the time the renewal takes effect, rather than at the time the application is submitted.

Regarding the National Environmental Policy Act, the applicable environmental guidelines for nuclear power plant license renewal should have been established prior to the issuance of this proposed rule.

The efficacy of a generic environmental impact statement is questionable at best. Each reactor is unique and should be addressed in individual environmental impact statements. The Generic Environmental Impact statement will merely serve to limit the issues that will be addressed at the public hearing stage of the license renewal process.

Sincerely,
Bradley M. Gordon
Bradley Gordon

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