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PROPOSED RULE (55 FR 29043)

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USNRC

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Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20545  
ATTN: Docketing and Service Branch

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear Sir:

I write on behalf of the Western Nebraska Resources Council (WNRC), a non-profit organization of Nebraska citizens working for environmental protection. We're some of the folks who pay your salary.

The WNRC is opposed to extending reactor licenses beyond their current 40 years through your proposed rule on Nuclear Power Plant License Renewal. We also are weary of having our taxpayer's dollars spent on promoting the nuclear industry's interests.

The following is a list of our reasons for objecting to your proposed rule and our suggestions:

- The NRC's history of regulatory enforcement is not such that the public can or should take the arbitrary generic determination of power plant safety on faith.
- The NRC should not only require a list of the documents which make up the current licensing basis, but the documents themselves. Furthermore, the NRC should review these documents to ensure that the plant requesting the renewal of the license at least complies with the terms of that license.
- The NRC should require that the licensee/applicant comply with the commitments made under the current license prior to issuance of a renewed license.
- Since the NRC has "resolved" all Unresolved Safety Issues, the NRC should require that the 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 that the licensee/applicant complies with the current licensing basis as it develops.

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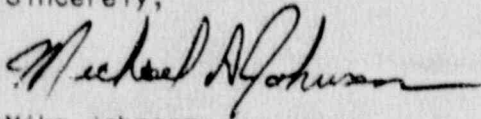
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- The proposed rule must ensure that the plant meet the "current" licensing basis, e.g. the licensing basis at the time the renewal takes effect, rather than at the time the application is submitted.
- Under the NRC's proposed rule a licensee/applicant is actually dissuaded from thoroughly exploring the safety implications of the license renewal. This is neither appropriate nor acceptable.
- The NRC must ensure that previously espoused regulatory philosophies do not undermine the "effective" programs established to address the problems of nuclear power plant aging.
- 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 site and reactor are 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.

It is deplorable indeed for the NRC to extend nuclear power plant licenses based upon the idea that all existing reactors are "safe enough." Enough information about these reactors does leak out for us to know this is not so. If the intention of this rule is to guarantee meltdown in the next 40 years, I suspect you will be successful.

Please consider your responsibility to the public and the planet. Act with the integrity due the government of the United States.

Sincerely,



Mike Johnson  
President