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Comments Regarding Proposed Rule
On Nuclear Power Plant License Renewal

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Secretary:

We would like to submit these comments concerning the Nuclear Regulatory Commission (NRC's) proposed rule on Nuclear Power Plant License Renewal so they will be entered into the formal record.

We are opposed to the renewal of nuclear power plant licenses for 20 years beyond the 40 years now permitted, and also to the opportunity for an additional 20 year extension upon expiration of the renewal license.

Both economic and safety factors indicate that this proposal is unsound. The proposed rule would allow certain reactors that are unlicensable under current regulations the potential for operating for 40 more years. The assumption that "with the exception of age-related degradation, the current licensing basis for each reactor provides and maintains an acceptable level of safety for operation during any renewal period" implies that there is no need for improvement, a conclusion we believe is far removed from reality.

The renewal procedure merely requires that the licensee/applicant compile the list of documents on which its current license is based. There would be no submission or review of these documents nor any investigation to confirm compliance with regulations in place under the current license.

The utilization of such "generic determinations" reflects a naive and undeserved trust in the nuclear industry's "good word", to put it politely!

Why does the proposed rule not require utilities to meet their commitments under the current license, or not require that Unresolved and Generic Safety Issues (USI + GSI) be resolved before receiving a renewal license? How can an unsubstantiated current licensing basis be "sufficient" to protect the public health and safety? We object to the Commission considering anything beyond that current licensing basis, safety "enhancement", in other words, not essential. It appears that any power plant that has operated for 20 years without experiencing a meltdown has achieved an adequate level of safety to continue operation for 20, 40 or 60 more years. This is an irresponsible, dangerous assumption!

Prior to the issuance of a license extension;

A. The documents that comprise the current licensing basis shall be reviewed and the plant shall be in compliance with the terms of the current license.

- B. all unresolved safety issues that the NRC has "resolved" shall be implemented by the utility.
- C. The existing operating license shall have expired. We do not think that after 20 years have passed on a 40 year current license, the utility should be able to renew for 40 years.

With the effects of aging prevalent in reactors well before the expiration of their current 40 year licenses, the Commission should conclude that extending these licenses will have the potential for catastrophic safety, health and financial ramifications.

The rule requires that each licensee must notify the NRC of information having significant implications for public health and safety, and then the word games begin. Violation of this provision occurs only if the licensee "fails to notify the Commission of information that the applicant or licensee has identified as having a significant implication for public health and safety or the common defense and security." Consequently, a utility could be in compliance with this notification provision without reporting information that relates to significant health and safety risks.

Age related degradation problems of reactors must be addressed in a manner that surpasses previous methods that allowed releases of radiation into the biosphere. Environmental guidelines should be in place before this proposed

rule is passed. Generic Environmental Impact statements are not appropriate because of the unique characteristics of various reactors.

We urge you to reject this proposed rule that would extend the existence of our present nuclear power plants. The nuclear utilities are creating waste for which there is no safe method of disposal. Our organization has been working within the system to ensure that the waste that has already been generated is stored in the safest possible manner, but we oppose nuclear power. The existing plants should be decommissioned as quickly as possible and our DOE grants should be utilized primarily for conservation and alternative energy research.

The existence of your BRC policy and DOE's TRUMP-5 research project indicates to us that you care more about saving money than saving lives. This proposed rule is another example of the same immoral attitude.

Opposition to nuclear power is growing. We resent this irresponsible path you have chosen to eliminate the necessity to build new nuclear power plants and suffer the political consequences, while still promoting unsafe nuclear power generation for many years into the future.

Sincerely,
Karen H. Prather, Pres.
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