

From: Eleanor Dwight <Eleanor@dwrightcentral.com>
Sent: Monday, June 15, 2020 11:58 PM
To: AdvancedReactors-GEIS Resource
Subject: [External_Sender] Docket IDNRC-2020-0101: No Generic Review for Unknown, Untested Nuclear Reactors

Nuclear Regulatory Commission

RE: Docket IDNRC-2020-0101: No Generic Review for Unknown, Untested Nuclear Reactors

Dear ,

Dear Kenneth T. Erwin:

I am writing in opposition to the U.S. Nuclear Regulatory Commission's proposal to produce a "generic" environmental impact statement (GEIS) for "small-scale advanced nuclear reactors." The stated purpose of this proposal is to "streamline" the environmental review process for unknown, untested types of nuclear reactors. This would contradict NRC's primary mission to protect the public health and safety, not to promote the commercial nuclear energy industry, for the following reasons:

- 1) NRC has no experience regulating "advanced" nuclear reactors (ANRs). .
- 2) Creating a generic environmental review is an exercise in speculative fiction. There is no such thing as a "generic" ANR. In fact, the whole category of "advanced reactors" covers a far wider variety of potential reactor designs than exist today.

There is no basis for assuming accidents with "small-scale" ANRs would not be able to cause significant offsite radiation releases. History shows there is no such thing as an accident-proof nuclear reactor.
- 4) There is no basis for determining that the "microreactors" contemplated in the GEIS would have a "small environmental footprint" or that there would be no offsite radiation releases in the case of an accident. Even "small-scale" reactors would contain large amounts of radioactive material, and generate power at very high density.
- 5) Non-light water reactors have been known to have significant safety risks for decades.
- 6) Advanced reactors would generate many different kinds and forms of radioactive waste that would be even more difficult to manage than produced by the current light-water reactors..
- 7) All of the environmental impacts of small-scale ANRs will have significant environmental justice impacts, from siting and construction, to reactor operations, leaks, and accidents; from fuel extraction and processing, to decommissioning, waste storage, and disposal. At every stage of the nuclear fuel cycle, polluting facilities and activities have been located disproportionately on indigenous peoples' lands and in African-American, Latinx, and other communities of color.

In addition, NRC must consider the futility of streamlining the environmental review and licensing process for ANRs due to the realities of climate change and the evolution of energy alternatives.

“Advanced” nuclear reactors cannot be safely licensed and built quickly enough to address climate change, if any of them prove commercially viable at all.

In addition, in any environmental impact statement, NRC must consider the need for the action and consider alternatives. Historically, NRC’s evaluation of the need for nuclear reactors has failed to include a realistic assessment of their actual costs, and it has used unrealistically unfavorable assessments of other energy options. There is no excuse for that now. Renewable energy, energy efficiency, battery storage, smart grids, and other sustainable, carbon-free energy resources are rapidly falling in price and making technological leaps and bounds far faster than the nuclear industry can possibly keep up. Wind, utility-scale solar, and energy efficiency are now the lowest cost energy resources available, and battery storage, distributed solar, and offshore wind on the same trajectory.

NRC must include a realistic, balanced, evidence-based assessment of climate change, energy alternatives, and the trajectory of the energy industry in all of its environmental reviews going forward.

For these reasons, I believe NRC must abandon the proposal for a streamlined environmental review and licensing process for small-scale advanced nuclear reactors (and ANRs of any size). Pursuit of the GEIS proposal is a waste of NRC’s resources, and would compromise NRC’s public health and safety mission.

Sincerely,
Eleanor Dwight

CO 80525
(970) 377-0863

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