

From: Joel Weisberg <jweisberg@carleton.edu>
Sent: Wednesday, June 24, 2020 11:54 AM
To: AdvancedReactors-GEIS Resource
Subject: [External_Sender] Docket IDNRC-2020-0101: No to generic EIS for advanced reactors

Nuclear Regulatory Commission

RE: Docket IDNRC-2020-0101: No to generic EIS for advanced reactors

Dear ,

Dear Kenneth T. Erwin:

I am a recently retired professor of physics and astronomy and the natural sciences, and an energy expert.

I am writing to state that I oppose the NRC's proposal to develop a one-size-fits-all "generic" environmental impact statement for small-scale advanced nuclear reactors.

Since the NRC has zero experience in regulating these types of reactors, it is dangerous to lower the standards for environmental review of these devices. This would contradict NRC's primary mission to protect the public health and safety, not to promote the commercial nuclear energy industry. The NRC's lack of experience in regulating such a wide variety of possible reactor designs requires rigorous study and experience. NRC has only issued GEIS's for other issues (such as decommissioning and license renewal) after years of real-world industry and regulatory experience. NRC has no such basis for generically evaluating small-scale ANRs. Note also that the term ANR covers a wide variety of possible designs, each with their own combinations of fuel sources, fuel designs, moderators, and coolants. This means they would also have different fuel cycles and undoubtedly different possible safety issues.

Furthermore, "small-scale" ANR accidents could still cause significant off-site radiation releases. The history of LWR is instructive, as when they were first developed, some thought that they were so safe that containments were not necessary.

Yet history has shown there is no such thing as an accident-proof nuclear reactor.

In addition, these multiple classes of "advanced" reactors would create different types of waste, each with their own particular difficulties and safety issues, none of which have been explored on the large anticipated scales from many such new reactors.

As with any relatively large industrial site, there will undoubtedly be local environmental justice issues which should be addressed case-by-case, not generically. A nuclear reactor of any type makes these issues even more salient, given potential radioactive contamination.

Historically, NRC EIS have downplayed the viability alternatives to nuclear power. Recent history has shown a surging advance in the competitiveness of renewable alternates which seems poised to

continue. A generic EIS would at best freeze in the current competitiveness of alternatives rather than encompassing the newest developments.

Even if a streamlined EIS process were implemented, advanced nuclear reactors will be too little, too late, to meaningfully address the climate change emergency that we were already in the midst of.

In conclusion, the NRC should 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 all these reasons, I believe that the 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,
Joel Weisberg

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