

**From:** Jan Boudart <janboudart1@gmail.com>  
**Sent:** Monday, June 29, 2020 5:51 PM  
**To:** AdvancedReactors-GEIS Resource  
**Cc:** nirsnet@nirs.org  
**Subject:** [External\_Sender] Docket ID: NRC-2020-0101: Any new uses for fission technology must take responsibility for their extra-campus emissions!

2020-06-29

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." I am a board member of Nuclear Energy Information Service, but am making these comments personally and on my own.

I do not see a reason for doing a generic environmental impact statement other than to re-assure creators of new technologies (or even new uses for old technologies) that they will not have to take responsibility for radiation that escapes the confines of their installations. But the mission of the NRC is to PROTECT THE PUBLIC, not to control liability to companies for their inevitable emissions of radiation.

Even *specific* Environmental Impact Statements fail in their purpose to predict the risks associated with projects that involve nuclear reactions, which are extremely complicated and surprise even the best minds as to their behavior and effects. Attempting to mitigate or remove that risk is unfair to the public. We will have to pay for miscalculations, carelessness, human error and the mathematical certainty of accidents.

It is not possible to predict the environmental impact of a wide variety of designs and a wide variety of locations. We cannot predict what the future will bring. The environmental impact of an "advanced" nuclear reactor (ANR) in the antarctic will be completely different — even if it were possible to use the same design — from one in a tropical setting. To make one EIS for both situations is ridiculous.

The sign-on statement from the Nuclear Information and Resource Service points out the lack of NRC experience with ANRs, and I will not repeat that here as I have already signed on to their statement.

I have heard hardly anybody mention the use of water to cool these reactors, notably the one planned for the INL out in the desert. It seems to be planned for installation under a large underground pool of water. How can that be justified where people need what is already an inadequate supply of water? Would a GIES pick out this particular environmental injustice, where an industry uses a huge proportion of the meager amount of water available?.

A propaganda ploy of this industry is that if one of the reactors has to shut down for any reason, the other reactors in the modular array will keep up the supply of electricity. Such an idea doesn't take into account that if the existential threat were an earthquake, flood or terrorist attack, all modules would probably be equally affected.

Two different designs can presumably use different sources of fuel, operate at different temperatures and use different coolant, to say nothing of the turbine designs and complicated valves, etc. (I can't begin to fathom all the moving parts, or even stationary parts going into an SMR.) Most people don't comprehend the miles of pipe, hundreds of valves, dangerous voltages and thousands of possible glitches that can stymie these machines. They appear almost rube goldberg-like, or they grewed like Topsy. I include myself in the "most people" of a previous sentence.

But one of the major objections I have to this project being undertaken by the NRC is that I object to the entire enterprise, from mining the radioactive ore, processing it, shipping it around the country, placing it in a reactor with all the danger implied, and setting it up to produce electricity. Pursuing new technologies related to fission can only increase death and disease among miners, mill workers, workers in processing plants, creators of fuel pellets and the workers in the power plants who must, ultimately be exposed to unacceptable levels (that is ANY LEVEL AT ALL) of radiation. This is a dangerous project from its inception to its completion that will visit its menace on our posterity for untold generations.

I am taking very seriously the points expounded in the Nuclear Information and Resource Service submission and I hope the readers of their petition will take it to heart. But my personal objections to further streamlining any nuclear project, be it military or domestic cannot be overstated. We must eschew further spending on nuclear research — except as it applies to cleaning up the mess already created. Fission, or fusion, research costs way too much money and has a hideously sinister outcome.

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 endangering the surrounding populations and animal and plant life in the future, including human life.

I appreciate whoever reads my comments and thank the NRC for making the opportunity to comment available.

Sincerely, Jan Boudart

**Federal Register Notice:** 85FR24040  
**Comment Number:** 2806

**Mail Envelope Properties** (CAAAQWA9uatnUWi3PovF3jaJ7mrQ20ZoUFhcYvMBeqfdFJnk2g)

**Subject:** [External\_Sender] Docket ID: NRC-2020-0101: Any new uses for fission technology must take responsibility for their extra-campus emissions!  
**Sent Date:** 6/29/2020 5:51:25 PM  
**Received Date:** 6/29/2020 5:51:42 PM  
**From:** Jan Boudart

**Created By:** janboudart1@gmail.com

**Recipients:**

**Post Office:** mail.gmail.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	5035	6/29/2020 5:51:42 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**