

From: [Matthew Sheinin](#)
To: [RulemakingComments Resource](#)
Subject: [External_Sender] Docket ID NRC-2020-0101: Do Not Weaken Emergency Preparedness for Nuclear Reactors and Other Nuclear Facilities--Strengthen it!
Date: Wednesday, July 08, 2020 12:24:46 PM

Nuclear Regulatory Commission (EPZs)

RE: Docket ID NRC-2020-0101: Do Not Weaken Emergency Preparedness for Nuclear Reactors and Other Nuclear Facilities--Strengthen it!

Dear ,

Commissioners and Staff of the Nuclear Regulatory Commission:

I am writing in opposition to the U.S. Nuclear Regulatory Commission's proposed rule change, docketed in the Federal Register (NRC-2020-0101), to reduce the emergency preparedness requirements for small modular reactors, "other new technologies," and production and utilization facilities.

Because of the COVID19 Pandemic, many people do not have the time to engage and review it right now. In light of this reality, I strongly encourage NRC to extend the comment period to 6 months after the end of the COVID-19 crisis.

In practice, NRC's current emergency planning requirements under 10 CFR 50.33 have been demonstrated to be inadequate in real-world situations. They should be made more stringent, not less, and not based solely on calculations of risk.

It is arbitrary and capricious for NRC to assume that license applicants for new reactor designs should be able to exempt themselves from emergency planning requirements solely on the basis of risk calculations. NRC has no experience regulating many potential reactor designs.

In addition, by creating a process for "small" reactors to eliminate offsite emergency planning through a cold calculation of the probability that a radiation release would not be large enough to warrant emergency response, NRC is opening the door for reactors of any size, design, and vintage to reduce or eliminate emergency planning.

NRC appears to be subjugating its prime responsibility to protect the public health and safety under the Atomic Energy Act as amended in 1975 to industry financial interests in lightened regulatory burden and streamlined licensing procedures. The public can have no confidence in this proposed regulation, and it must be rejected.

Sincerely,
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