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Categorical Exclusions from Environmental Review

Comment On: NRC-2018-0300-0001
Categorical Exclusions from Environmental Review

Document: NRC-2018-0300-DRAFT-0003
Comment on FR Doc # 2021-09675

Submitter Information

Organization: Citizens' Environmental Coalition

General Comment

See attached file(s)

Attachments

Final LTR NRC Proposed Categorical Exclusions 7.19.2021



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July 21, 2020

U.S. Nuclear Regulatory Commission
Mail Stop O-4F00
Washington, DC 20555-0001

Submitted via
<https://www.regulations.gov>

Re: Docket ID NRC-2018-0300, Proposed Rulemaking, Categorical Exclusions from Environmental Review

Dear NRC Staff,

We are responding to the Federal Notice related to NRC's proposal to establish categorical exclusions, whereby certain licensing, regulatory and administrative actions in NRC's view will not have a significant effect on the human environment.

Unfortunately we have been very concerned about numerous NRC actions in recent years which have lessened or weakened regulation for radionuclides and/ or radioactive waste. This new proposal seems to be more of the same deregulatory actions we have seen recently. However, we also note that it is difficult to even understand the list of actions contained in the Federal Registry notice, as the actions are poorly described.

In recent years NRC has engaged in Creative Regulatory Relief for the nuclear industry. It might also be called deregulation.

Some examples:

- Spent fuel pools were allowed to increase the density of spent fuel by 5-6 times beyond their original design specifications, delaying movement to dry storage and increasing potential catastrophic risks.

- Additional safety standards for these spent fuel pools were recommended following the Fukushima disaster by the National Academy of Sciences, but NRC rejected most of the recommendations.
- High Level Waste regulations were relaxed – reducing former applicable regulations.
- Greater than Class C waste was proposed for reduced regulation, thus no longer needing a repository. No final decision has been made yet (status not certain).
- High Burnup Fuel needed more comprehensive research according to the US Nuclear Waste Technical Review Board. Rather than arrange the research, NRC has moved forward with higher burnups and enrichment up to 20%. The Commission also failed to require monitoring of the accumulation of oxides and hydrides on fuel rods, to ensure that emergency core cooling will not be impacted.
- Remote handling facilities or Dry Transfer systems to transfer leaking containers of spent nuclear fuel were adopted by NRC as requirements in 2014, but abandoned for planned Consolidated Interim Storage Facilities. At the closed Oyster Creek reactor, rather than having replacement containment available, the current plan is to dig a pit to put a leaking canister in. Notably this alone will not contain radioactivity.
- Extending reactor licenses far beyond their original design life to 80 or 100 years is another new plan being implemented in the absence of adequate scientific and environmental review. Coupled with this there will be no testing of metal samples in the reactor core to ensure the pressure vessel will not experience sudden shattering during emergency cooling.

None of the decisions above received a detailed scientific evaluation or review. It seems that Categorical exclusions will also not receive a science-based technical review and assessment.

Such actions are ensuring that the US will be the location for the next serious nuclear catastrophe.

Thank you for your attention.

Sincerely,

A handwritten signature in black ink that reads "Barbara J. Warren". The signature is written in a cursive style with a large, prominent initial "B".

Barbara Warren, RN, MS
Executive Director
Citizens' Environmental Coalition