

From: [Riverkeeper](#) on behalf of [Christine La Monica-Lunn](#)
To: [RulemakingComments Resource](#)
Subject: [External_Sender] Comments on NRC's Draft Decommissioning Rule (Docket ID: NRC-2015-0070)
Date: Friday, August 26, 2022 1:05:57 AM

Aug 25, 2022

Secretary U.S. Nuclear Regulatory Commission Rulemakings and
Adjudications Staff
Washington, DC 20555-0001

Dear: Secretary Rulemakings and Adjudications Staff,

Thank you for the opportunity to comment on the NRC's proposed amendments to its regulations that relate to the decommissioning of production and utilization facilities. We urge the NRC to provide for more stringent emergency preparation requirements throughout the decommissioning process than those proposed in the rule.

It is crucially important that decommissioning not only be done in a safe and effective way, but that local communities who bear the greatest continuing risk are involved and funded to be able to respond appropriately to any emergency or concern that impacts the citizens in the affected area. While some changes to the various emergency response preparation and security measures at decommissioning sites are needed to reflect the end of operations, the proposed regulations go too far. Rather than eliminating existing emergency planning measures, such as offsite emergency plans for permanently defueled sites; it is advisable to consider allocating the existing resources in a thoughtful and creative manner to benefit the local communities to increase effectiveness rather than placing more burden on the limited local and state resources.

For example, some of the resources dedicated to onsite firefighting could be integrated with the local firefighting forces to provide additional support for the local forces who are responsible for responding to events at a decommissioning site. In addition, the offsite emergency response planning plan could be pared down and some resources redirected to add capacity to local and state emergency response teams.

Such relatively minor yet impactful commitments from the decommissioning sites can provide many benefits and added security to the local communities who through no fault of their own have been forced to bear the increased risk for so many years.

Sincerely,

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