

**From:** [Riverkeeper](#) on behalf of [Alice Shields](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Comments on NRC's Draft Decommissioning Rule (Docket ID: NRC-2015-0070)  
**Date:** Friday, August 26, 2022 2:23:49 AM

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Aug 26, 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.

The decommissioning of production and utilization facilities must be done with the utmost care for the protection of American citizens.

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; rather, it should consider allocating the existing resources in a 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 commitments from the decommissioning sites can provide much benefit and added security to the local communities who have been forced to bear increased risk for so many years.

Sincerely,

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