

**From:** [Riverkeeper](#) on behalf of [Jean Naples](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Comments on NRC's Draft Decommissioning Rule (Docket ID: NRC-2015-0070)  
**Date:** Friday, August 26, 2022 7:54:36 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,

I am writing as a physician and public health advocate who lives along the banks of the Hudson River in Suffern, New York. At this time, I appreciate and thank the Nuclear Regulatory Commission for granting me the opportunity to comment on the NRC's proposed amendments to its regulations that relate to the decommissioning of production and utilization facilities. I strongly urge the NRC to please provide for more stringent emergency preparation requirements throughout the decommissioning process than those proposed in the rule

As a public health advocate, I am very concerned because it is crucial that this new rule not eliminate the existing security measures, which include an offsite emergency plan for permanently defueled these sites. The NRC should rather consider allocating the resources to benefit the local communities to increase effectiveness rather than relying on the limited local and state resources. Please understand that the excess capacity of Indian Point's on-site firefighting force could be used to support local community firefighting in small towns around Indian Point. The existing siren system could be recalibrated to provide alerts for both nuclear and pipeline emergencies. Such relatively minor commitments can provide much benefit and added security to the local communities who have been forced to bear increased risk due to their location near Indian Point, for so many years.

I am alerting you to the fact that 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 need to be recalibrated because rather than eliminating existing emergency planning measures, such as offsite emergency plans for permanently defueled sites; it is much safer to 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.

To support our local firefighter units, 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 reduced and some resources redirected to add capacity to local and state emergency response teams.

At this time, I thank you for your consideration of my letter and recommendations. It is important to understand that instituting relatively minor commitments from the decommissioning sites can provide

much benefit and added security to the local communities that surround Indian Point. These are the communities who have been forced to bear increased risk for so many years.

Sincerely,  
Jean Marie Naples, MD-Ph.D.

Sincerely,

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