

**From:** [Riverkeeper](#) on behalf of [Joanne Sanchez](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] Comments on NRC's Draft Decommissioning Rule (Docket ID: NRC-2015-0070)  
**Date:** Friday, August 26, 2022 9:24:40 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. We cannot push aside safety for profits. This is an opportunity for the NRC to demonstrate its regulatory duty to protect people over what Holtec International is wanting to short cut safety.

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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