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**Subject:** [External\_Sender] Comments Generic Environmental Impact Statement for License Renewal of Nuclear Plants  
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Secretary, U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

Please accept the following brief comments on the proposed changes to NRC regulations, draft Revision 2 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (LR GEIS) by Susybelle L. Gosslee.

I am asking the Nuclear Regulatory Commission (NRC) staff to investigate every part of nuclear reactors when evaluating the approval process prior to relicensing extension. Data from the inspections should be included in the site-specific GEIS process and the requirements to do so should be part of the GEIS. The integrity of the NRC, the nuclear industry, and every nuclear reactor operator is being evaluated by the public to see if they meet the mission of the agency or if the NRC is working to fulfill the wishes of the industry and reactor operators.

The **NRC's mission** is: “to regulate the nation's civilian use of byproduct, source, and special nuclear materials to ensure adequate protection of public health and safety, to promote the common defense and security, and to protect the environment.”

In order to make the best decisions to ensure the health, safety, and protection of the public and the environment, the NRC must also consider protecting the economy which is affected by the final decision, especially if there is an accident. An accident could have extreme and expensive consequences and must be avoided. Operational, repair, and accident costs should be considered throughout the evaluation process.

The NRC staff's decision to update the review process is a good one; however, it should not be at the expense of a thorough review. All old and vulnerable equipment, flaws, equipment needing updating, and embrittled metal, and other costs should be evaluated, even assuming no further government subsidies for operations and repairs. The review process should have been updated years ago, because of all the changes in the industry, nuclear technology, and the changes in the creation of energy in the United States to sustainable energy.

First, make a plan of how the review process, the research, and report will be made and presented to the public. Gather all the information needed to make a responsible well-informed and productive decision by using multiple third-party, up-to-date resources, research, and

studies. Lack of information leads to ineffective decisions and possibly dangerous and costly decisions. Full investigation with analysis, critical thinking, and deep investigation with staff listening and hearing the public's comments with an open mind to arrive at the best solutions. The public knows their own community's weather, earthquakes, lakes and waterways, droughts, floods, wind, temperatures, and all other environmental aspects which could affect the nuclear reactor. Investigate how the changes in the climate will affect the reactor during the next twenty to forty years on a Category 2 site-specific basis.

The NRC staff should gather all the information needed to be informed about the current status of **every** system throughout the reactor based on thorough recent inspections. If one-part breaks or dysfunctions, an accident could ensue or a criticality could follow that leads to disastrous consequences. Evaluate all the internal and external systems and write a complete report. Dealing with old systems, parts, metals, etc. is a liability and a risk, especially when the proposal is to lengthen the life of the various parts during a time when so many climate factors are becoming more extreme.

Identify and list all the risks. When a risk is identified, determine the costs to repair and replace and identify other alternatives with costs and the estimated length of time to repair or replace the old system. In addition, state the estimated length of time when the new system will be operational and state the impact of that particular part being out of operation.

To identify cancer risks, I request that the most recent local cancer registry data be included in each site specific EIS.

Evaluate the earlier steps. Determine what other unplanned issues need to be addressed and study them. Make a complete list of all the risks with costs to replace and a timeline to replace or repair. List the unplanned issues in a priority format using the best practices and standards, remembering that safety is the highest value in decision-making.

Review the previous decisions to determine if they are still sound and relevant.

Evaluate the total costs of an accident to the public, health, and infrastructure near and far from the reactor, on the economy, and local, state, and national governments.

To make a comparison, when a house is purchased, the buyer requests a home inspection be made by a well-trained professional with no conflict of interest. Every detail of the entire property will be evaluated and reported to the purchaser. In the case of nuclear reactors and the Nuclear Regulatory Commission, the public is the one to be protected and ensured of the safety of the plant. Full and accurate disclosure is necessary and the responsible way to proceed.

Sincerely,

Susybelle L. Gosslee