

PUBLIC SUBMISSION

As of: May 04, 2023
Received: April 28, 2023
Status: Pending_Post
Tracking No. lh0-vix7-86or
Comments Due: May 02, 2023
Submission Type: API

Docket: NRC-2018-0296

Generic Environmental Impact for License Renewal

Comment On: NRC-2018-0296-0017

Renewing Nuclear Power Plant Operating Licenses-Environmental Review

Document: NRC-2018-0296-DRAFT-0371

Comment on FR Doc # 2023-04102

Submitter Information

Name: Gary Lee

Email: palmsprings.gary@verizon.net

General Comment

Thank you for considering feedback on the proposed License Renewal GEIS. The NRC should extend the comment deadline, address inadequate and unreasonable guidance, and expand opportunities for public involvement.

1. There is no precedent with operating reactors for anywhere close to 80 years. No commercial nuclear reactor in the world has operated for 60 years. The world's longest operating reactors have only now run for 54 years. Every reactor that began operating earlier shut down before 50 years of operation.
2. NRC process excluded the public and rushed the process. NRC did not conduct a public scoping process, and provided no formal opportunity for the public to weigh in before publishing the draft GEIS. The NRC must extend the comment period by 60 days.
3. NRC must not consider 80-year license extensions so soon. Nuclear plant owners are applying for second license extensions decades before the current 60-year extended licenses expire. This policy sends a dangerous signal to nuclear operators that if they apply for license extensions incredibly early, they do not have to consider certain alternatives or impacts.
4. The GEIS's consideration of energy alternatives is inadequate and unreasonable. It unjustifiably relies on valuing the outdated, irrelevant characteristic of "baseload generation. It discounts the value of renewable energy sources, such as solar and wind, by emphasizing the intermittency of their electricity generation, even though they are proving equally predictable and more reliable than fossil fuel and nuclear power plants.
5. Impacts on communities and ecosystems must be considered site-specifically. The risks and environmental impacts of nuclear disasters are inherently site-specific. Each nuclear power plant has site-specific conditions that affect the likelihood and nature of a radiological disaster, such as: a) Geology and seismicity, b) Hydrology, c) Severe weather events and climatic conditions, and D) Security risks and vulnerabilities

6. The NRC has failed to address the inherent dangers of operating reactors for up to 80 years. The NRC has never adequately addressed the impact of aging-related degradation of reactors, and has no data on the material condition of reactors on which to evaluate the effectiveness of licensees' aging management programs.

Please allow more time for comments. This is too important to rush through.