



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

May 5, 2022

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

REQUEST FOR EXTENSION OF TIME TO COMMENT ON PROPOSED RULE
RE: REGULATORY IMPROVEMENTS FOR PRODUCTION AND UTILIZATION
FACILITIES TRANSITIONING TO DECOMMISSIONING

Dear Commissioners,

The BlueGreen Alliance requests an extension of time to comment on the U.S. Nuclear Regulatory Commission's (NRC's) proposed decommissioning rule, and related documents posted March 4, 2022. We seek an extension of the commenting deadline from May 17, 2022, until August 31, 2022, for a total commenting period of 180 days (six months). The requested extension is necessary to provide interested members of the public with a meaningful opportunity to review and analyze the voluminous rulemaking record.

This rulemaking is critically important to the protection of public health and safety and the environment because it will establish final standards governing the decommissioning of many currently operating nuclear reactors across the United States in coming decades. The legal and technical issues raised by decommissioning these reactors—and therefore by this rulemaking—are complex and significant, involving the potential relaxation of several safety requirements that previously were addressed in plant-specific license amendment and extension proceedings. This rulemaking also has environmental justice significance, thus warranting a six-month period for public participation.

Further, commenters also must familiarize themselves with a body of voluminous documents not identified as relevant by the NRC, but which are clearly relevant to this rulemaking. As such, commenters cannot meaningfully review said records and respond in 75 days. The comment period is insufficient to allow both written comments and participation in public proceedings. NRC has previously afforded the public with a commenting period of 120 days (four months) at a less critical point in the rulemaking cycle, when the record was substantially smaller.

For these reasons, the BlueGreen Alliance respectfully submits that NRC should provide a total of 180 days (6 months), or until August 31, 2022, to ensure meaningful opportunity to comment on the critically important Proposed Rule.

Respectfully submitted,

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