



Industrial Energy Consumers of America

The Voice of the Industrial Energy Consumers

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February 21, 2013

The Honorable Allison M. Macfarlane
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555

The Honorable William D. Magwood, IV
Commissioner
U.S. Nuclear Regulatory Commission
Washington, DC 20555

The Honorable Kristine L. Svinicki
Commissioner
U.S. Nuclear Regulatory Commission
Washington, DC 20555

The Honorable William C. Ostendorff
Commissioner
U.S. Nuclear Regulatory Commission
Washington, DC 20555

The Honorable George Apostolakis
Commissioner
U.S. Nuclear Regulatory Commission
Washington, DC 20555

RE: NRC Staff Recommendation on Filtered Vents

Dear Chairman Macfarlane and Commissioners:

On behalf of the Industrial Energy Consumers of America (IECA), we ask that the U.S. Nuclear Regulatory Commission (NRC) give careful scrutiny to the technical staff recommendations on filtered vents for BWR Mark 1 and 2 reactors. As large industrial consumers of electricity, the cost and reliability of electricity is very important to our competitiveness, and unnecessary regulations can drive up costs and possibly shut down some existing nuclear units. Since all regulatory costs are passed onto us, the consumer, we urge you to give an especially careful examination as to whether the staff recommendations are needed to provide sufficient public safety.

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.1 trillion in annual sales, over 1,000 facilities nationwide, and with more than 1.4 million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemical, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, brewing, cement, agricultural equipment, and automotive.

IECA strongly supports a diverse energy mix for power generation, including nuclear energy. Recently, three nuclear facilities have announced that they will be shutting down because they can no longer compete with alternatives. Given that you are currently reviewing new regulations that will add additional costs to the existing facilities, we cannot help but be concerned that other units will also shut down, reducing reliability and diversity of the U.S. electric supply.

It is apparent to us that the nuclear energy industry is working with the NRC to implement some of the most stringent safety measures in the world and is committed to pursuing the most reliable solutions that have proven safety results, based on science and facts. However, the industry raises legitimate questions regarding the installation of filtration systems and their need to satisfy the statutory mandate that the NRC safety requirements provide “adequate protection” of public health. Our understanding is that existing safety measures already are in place to satisfy that requirement. And, of the several analyses that have been done of potential filtration requirements over the years, none has passed the regulatory standard for providing significant safety benefits.

We thank you for your careful consideration of these views, and look forward to hearing from you.

Sincerely,

Paul N. Cicio
President

cc: The Honorable Ron Wyden
The Honorable Lisa Murkowski
The Honorable Fred Upton
The Honorable Henry Waxman