

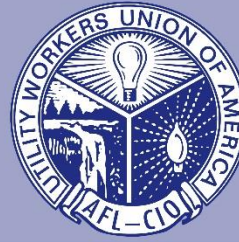
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May 5th, 2022

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 Utility Workers Union of America (UWUA) 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 4th, 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, including the nuclear industry workforces most directly affected by facility decommissioning, with a meaningful opportunity to review and analyze the voluminous rulemaking record.

This rulemaking is critically important to protecting the rights and economic interests of both the workforces in closing nuclear facilities and the communities in which they live, as well as 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 social and economic issues raised by decommissioning these reactors – and therefore by this rulemaking – are complex and significant, with worker, community, and environmental justice significance, thus warranting a six-month period for public participation.

Further, commenters must familiarize themselves with the body of voluminous documents 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 UWUA 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.

Sincerely,

James T. Slevin
National President
Utility Workers Union of America, AFL-CIO