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**From:** "Jay Adams Ph.D./ Klaus Schumann" <jayklaus@msn.com>  
**To:** <OPA@NRC.GOV>  
**Date:** 9/4/03 12:44PM  
**Subject:** Comments on GEIS on re-licensing of nuclear power plants

GREEN PARTY of CALIFORNIA

SLO GREEN Party, P.O.Box 13244, San Luis Obispo, Ca. 93406

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Comments on behalf of the San Luis Obispo (SLO) GREEN Party

by

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to

United States Nuclear Regulatory Commission

Re: Generic Environmental Impact Statement regarding

Re-licensing of Nuclear Power Plants

September 3rd, 2003

Template = ADM-013

F-EIDS = ADM-03  
Gdd = B. Zakerman (BXZ)

#### Introduction:

The GREEN Party is the largest political party on Earth. We are active in over 90 countries and on all five continents. Naturally, there is a wide diversity of opinion and expression. But when it comes to nuclear power, GREEN parties everywhere on Earth speak with one clear voice:

Phase out nuclear power now and stop producing the dreadful radioactive wastes.

How much sense does it make to continue with a technology which benefits just one or two generations but then burdens the next 12,000 with safeguarding the extremely toxic radioactive wastes !?! Without taxpayer subsidies, bail-outs, "recovery of stranded costs" and similar schemes, nuclear power cannot compete with benign and sustainable energy sources. Why continue to expose the residents of our planet to the risk of nuclear catastrophe when other forms of energy production are readily available?

Therefore, the SLO GREEN Party opposes any re-licensing of existing nuclear power plants, whether generic or site specific.

#### Specific Comments:

However, since the Diablo Canyon Nuclear Power Plant is already in operation in SLO County and has already piled up vast amounts of High Level Nuclear Waste on its site and for as long as the plant continues to operate despite of the GREEN Party's position the SLO GREEN Party feels compelled to offer the following comments:

#### I.

The SLO GREEN Party generally agrees with the comments as filed by SLO Mothers for Peace and make them part of ours. We also refer to our comments as submitted on 3-24-03 to NRC's Atomic Safety and Licensing Board.

#### II.

The SLO GREEN Party is particularly concerned with the threat the high level radioactive waste ("spent fuel") pools represent to surrounding communities. Especially, the possibilities of fires, due to the flammable nature of zirconium alloy in the cladding, has only been recognized by the NRC since its finding in October 2000. Unfortunately, the NRC has downplayed the significance of its own finding ever since. In

light of 9/11, this finding has gained even more importance because, unlike the reactor domes, the pools lack containment and sufficient structural strength of their housing. This applies for the Boiling Water Reactors because their pools are usually located several stories above ground with the possibility of total drainage of the crucial cooling water. But Pressurized Water Reactors are also more vulnerable than the NRC has recognized so far where the possibility of partial drainage exists. Take for example the Diablo Canyon Nuclear Power Plant in our County: PG&E claims that the pools are safe because the spent fuel is stored below ground. While technically true by less than 1 foot, 25 feet of the cooling water in the pools are above ground level at Diablo, according to PG&E information. Draining those top 25 feet could cause a dangerous partial drainage with the result of the remaining water temperature reaching the boiling point. Additional water could be siphoned off by terrorists. More water will boil away. The NRC finding from 10/2000 found the critical water level for boiling just 3 feet above the top of the assemblies, that's more than 2 feet more than at Diablo if the water drains to ground level. In addition, partial drainage could result in the explosive build-up of hydrogen gas!

All of these problems are avoidable at reasonable costs by returning the pools to their original "low density" design combined with "hardened" dry cask storage.

Are any such alternatives being taking into consideration? If not, why not?

III.

Moreover, NRC studies have found possible impacts up to 500 miles from the sites in the event of a spent fuel pool fire. Yet PG&E tries to convince the public that terrorist attacks on Diablo are unlikely due to the unpopulated area within 5 miles around the plant. The NRC has every obligation to inform the public about the true ramifications of such an attack and should put a stop to misleading public relations statements by the operators.

IV.

In addition, we have concerns that the NRC does not focus enough on the inevitable changes over the span of the next 50 years.

Re-licensing at Diablo would assure full pools until at least 2050. The populations near the plants can't afford a reactive mode by the authorities. The NRC is fully aware of the catastrophic consequences of a pool fire or a maximum severe reactor incident. Seismology is a science in flux. Population patterns are changing. The aging factor at the plants is not yet fully understood. Who knows what the political development will be over the next half a century, what kind of weapons will be in the wrong hands? .

Summary

Given all of the above, re-licensing, especially 20 years ahead of time, whether generic or site specific, is a disservice to public health and safety. Re-licensing of the existing nuclear plants would therefore be a violation of your mandate.

For the SLO GREENS

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