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**To:** "Rules and Directives Bran Nuclear Regulatory Commission" <GrandGulfEIS@nrc.gov>  
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**Subject:** Comments on NUREG-1817, 70 FR 81, pp. 22155-22156

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Rules and Directives Bran Nuclear Regulatory Commission  
Division of Administrative Services, Office of Administration  
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Washington, DC 20555-0001

Rules and Directives Bran Nuclear Regulatory Commission:

I am writing to OPPOSE Entergy's application for an Early Site Permit (ESP) at the Grand Gulf nuclear plant in Claiborne County, Mississippi.

The draft EIS fails to evaluate the environmental impacts and security threat of indefinitely storing the additional irradiated fuel that would be generated by the proposed additional nuclear unit onsite. Yucca Mountain in Nevada is far from a done deal. Numerous scientific questions remain about whether the site can safely store waste and recently a scandal has erupted over the possible falsification of scientific studies used to justify the geologic suitability of the site. The environmental impacts of indefinite storage must be thoroughly evaluated in the final EIS.

Nuclear power plants have known vulnerabilities to terrorist attack and sabotage. According to the 9/11 Commission Report, al Qaeda specifically discussed targeting U.S. nuclear plants. Fuel storage pools, dry storage facilities, and reactor control rooms are not designed to withstand the type attack that occurred on September 11, 2001. Ignoring the threat because it is "highly speculative" does not make the threat go away, and indicates one shortfall of using an exclusively risk-based approach—especially considering Grand Gulf's location on the Mississippi River, which could make it an attractive strategic target. An analysis in the draft EIS of the suitability of the site to place the reactor containment below-grade level should be done, which would require an in-depth analysis of geological and hydrological conditions at the site.

In conclusion, too many questions remain to conclude that more nuclear power at Grand Gulf offers a benefit to Port Gibson, the state of Mississippi, or this country.

Sincerely,

brian carey  
315-498-4328

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