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**From:** kathleen Loveseth <loveseth@cluas.com>  
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**Subject:** Comments on NUREG-1817, 70 FR 81, pp. 22155-22156

## To Whom It May Concern:

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 information contained in the Draft Environmental Impact Statement (EIS), is incomplete and insufficient so as to form a basis for acceptance of the application; further, the information that is contained in the document suggests that the peculiar economic situation faced by the host community makes it unlikely that an emergency at the plant can be addressed in the necessary manner.

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A new reactor could unfairly burden minorities and low-income populations, which have a disproportionately high representation in Claiborne County. The draft EIS acknowledges the high concentration of minority and low-income persons around Grand Gulf and considers the possibility that a new reactor may not provide an economic benefit to the community, but ultimately concludes that operation of a new reactor would produce only "minimal negative and disproportionate health impacts on minority and low-income members of the public." Such a conclusion does not consider the increased risk of adverse health impacts from a nuclear accident at Grand Gulf that would be endured by the nearby residents were an additional reactor constructed.

It is not clear that a new reactor at Grand Gulf would provide an economic benefit to the people of Claiborne County; in fact, new development at Grand Gulf may prove to be a drain on the county's resources. According to findings in the draft EIS, it is "not clear whether Claiborne County would receive property taxes, sales, and use taxes, or other taxes and public monies commensurate with the costs of its additional emergency management and public services obligations. The net financial burden may fall on local residents and taxpayers, most of whom are minority and low-income persons." Local officials have testified to the fact that an additional reactor could overburden their already insufficient emergency preparedness resources.

Also of concern is the deficient consideration of renewable energy sources in the draft EIS. While the evaluation does consider renewable energy sources as an alternative, it not give a fair and thorough review of the potential of clean, sustainable energy, and it relies partly on evaluations performed by SERI. The draft EIS overstates the impacts of clean energy alternatives and understates the impacts of nuclear power, wrongly concluding renewable energy sources would not be superior to a new nuclear unit at Grand Gulf "from an environmental perspective." Further, by considering only renewable energy deployment physically at the Grand Gulf site, it unfairly limits the scope of the review and the potential for renewable energy technologies to provide a meaningful contribution to the electric supply. Conservation and efficiency improvements are also unfairly dismissed.

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

SESP Review Complete

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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.

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