

RAS12010

From: "Stephanie Abrahams" <abrahams.s@hotmail.com>
To: <hearingdocket@nrc.gov>, <amy@nrc.gov>
Date: Mon, Jul 17, 2006 11:16 AM
Subject: Pilgrim License Renewal Statement

Attached and copied into this email is a statement from MASSPIRG, Toxics Action Center, and Clean Water Action regarding the relicensing of the Pilgrim Nuclear Power Plant.

Office of the Secretary
Attn. Rulemaking and Adjudications Staff
Mail Stop: O-16C1
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Administrative Judge Ann Marshall Young
Atomic Safety and Licensing Board Panel
Mail Stop: T-3F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001.

Statement on Behalf of Clean Water Action, MASSPIRG, Toxics Action Center

To Judge Ann Marshall Young and the Rulemaking and Adjudications Staff,

We appreciate the opportunity to take part in the environmental review of the Pilgrim Nuclear plant during the re-licensing process. The public deserves a strong voice in the decision of whether to extend the life of such a controversial facility.

We fully support the motions filed by the Attorney General of Massachusetts and Pilgrim Watch, who are petitioning the Nuclear Regulatory Commission for an adjudicatory hearing on Entergy's application for re-licensing the Pilgrim nuclear power plant. We agree with the petitioners that Entergy's application fails to comply with the National Environmental Policy Act's requirement that Entergy take into account significant new information regarding environmental impact in its application.

There is a wide range of issues where significant new information should affect the application; these include the risk of spent fuel pool storage and radioactive fires; risks from terrorist attacks; impacts of radioactive releases; and the impacts of the once-through cooling system.

We urge the NRC to consider in-depth each of these significant environmental impacts, which we believe are grounds for denying the re-licensing of the plant.

Spent fuel: Over 1.2 million pounds of high-level radioactive waste is stored on site at the Pilgrim plant. It is estimated that this number will more than double if Pilgrim is allowed to operate for an additional twenty years. This waste poses a risk to the health of humans and ecosystems for centuries to come, but there are currently no clear disposal options outside of the state. Federal plans for storage are inadequate and new evidence suggests that plans for Yucca Mountain storage may not move forward. In recent months the Senate panel has cut requested funding for the program, and geologists have assessed the area and deemed it a complex geological

DOCKETED
USNRC

July 17, 2006 (11:16am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

area. This new information regarding Yucca Mountain clearly portrays major impediments to the progress of the project. Even if present plans for establishing a Federal Waste Repository at Yucca Mountain move forward on schedule, that facility would reach maximum capacity long before a re-licensed Pilgrim stopped generating waste. Plant owners and the NRC need to have a clear and safe plan for storage of radioactive waste before the extension is granted. In addition, current storage of spent fuel at the Pilgrim plant is unsafe. Spent fuel is stored in cooling pools that are highly vulnerable to accidents or sabotage and are located outside the primary containment area. These pools are less secure than the nuclear reactor and the radioactivity of these pools far surpasses that of the reactor's core. The removal of water from these pools could easily cause an uncontrollable fire releasing a devastating level of radiation into the surrounding area. Recent analysis by Dr. Gordon Thompson and Dr. Jan Beyea estimate the costs and latent cancers following releases of Cesium-137 from Pilgrim's spent fuel pool:

	10% release C-137	100% release C-137
Cost	\$105-\$175 billion	\$342-\$488 billion
Latent Cancers	8,000	24,000

This new knowledge of costs and risks associated with spent fuel storage must be analyzed thoroughly before considering re-licensing the Pilgrim Nuclear Power Plant.

Terrorism: The nation's nuclear facilities' vulnerability to a planned terrorist attack can no longer be ignored. Since the September 11th attacks, these concerns have come into greater focus. A recent study done by Large & Associates states that nuclear power plants are almost totally unprepared for a terrorist attack from the air. The study also noted that the probability of success of a deliberate attack is essentially 100%. (John H. Large, Large and Associates, "The Implications of September 11th for the Nuclear Industry," Disarmament Forum, vol. 2, 2003). This credible risk, which has not been thoroughly discussed, must be examined when discussing the re-licensing of the Pilgrim nuclear power plant.

Radioactive releases: The National Academy of Sciences BEIR VII report from July 2005 stated that there is no safe dose of radiation. Pilgrim's daily radiation emissions have been linked to increased rates of leukemia and thyroid cancers in towns around Plymouth (Morris, MS and Knorr, RS. Southeastern Massachusetts Health Study. Final Report. Boston, MA; Bureau of Environmental Health Assessment, Massachusetts Department of Public Health, 1990). In addition, new evidence indicates that on average, by 2030, nearly 1 in every 3 people in the Emergency Planning Zone will be 55 or over. (The Boston Metropolitan Area Planning Council Report on Population and Employment Projections 2010-2030, available at: http://www.mapc.org/2006_projections.html). This age group, which is currently increasing, is more susceptible to the effects of radiation (Richardson, DB and Wing, S. Greater Sensitivity to Ionizing Radiation at Older Age: follow-up of workers at Oak Ridge National Laboratory through 1990. Int. Journal of Epidemiology, 1999, 28:428-436.) It is necessary, when looking at the re-licensing of the Pilgrim Nuclear Power Plant, to look at both the increased knowledge of radiation effects, and these effects on an older population.

Once-through cooling system: The Pilgrim Plant's cooling system causes

significant damage to the environment of Cape Cod Bay. Pilgrim uses a once-through cooling system, taking in nearly one-half billion gallons of water a day, and sending it into the Bay at 25 or more degrees hotter. An additional 20 years of operation at Pilgrim using this cooling system could kill billions of aquatic plants and animals. This cooling system also violates Section 316(b) of the federal Clean Water Act, which requires the plant to use the best available technology to minimize environmental impact.

We believe that the plant must be held to the highest standards under the Clean Water Act, and a closed-cycle cooling system should be installed as soon as possible and certainly before the license extension is granted.

Based on the seriousness of these environmental impacts, we ask the Commission to include issues of waste accumulation and storage, terrorism, radiation release and impacts of the Pilgrim cooling system in its environmental review.

Sincerely,
Brian Thurber, Clean Water Action
Frank Gorke, MASSPIRG
Stephanie Abrahams, MASSPIRG
Sylvia Broude, Toxics Action Center

Is your PC infected? Get a FREE online computer virus scan from McAfee® Security. <http://clinic.mcafee.com/clinic/ibuy/campaign.asp?cid=3963>

Office of the Secretary
Attn. Rulemaking and Adjudications Staff
Mail Stop: O-16C1
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Administrative Judge Ann Marshall Young
Atomic Safety and Licensing Board Panel
Mail Stop: T-3F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001.

Statement on Behalf of Clean Water Action, MASSPIRG, Toxics Action Center

To Judge Ann Marshall Young and the Rulemaking and Adjudications Staff,

We appreciate the opportunity to take part in the environmental review of the Pilgrim Nuclear plant during the re-licensing process. The public deserves a strong voice in the decision of whether to extend the life of such a controversial facility.

We fully support the motions filed by the Attorney General of Massachusetts and Pilgrim Watch, who are petitioning the Nuclear Regulatory Commission for an adjudicatory hearing on Entergy's application for re-licensing the Pilgrim nuclear power plant. We agree with the petitioners that Entergy's application fails to comply with the National Environmental Policy Act's requirement that Entergy take into account significant new information regarding environmental impact in its application.

There is a wide range of issues where significant new information should affect the application; these include the risk of spent fuel pool storage and radioactive fires; risks from terrorist attacks; impacts of radioactive releases; and the impacts of the once-through cooling system.

We urge the NRC to consider in-depth each of these significant environmental impacts, which we believe are grounds for denying the re-licensing of the plant.

Spent fuel: Over 1.2 million pounds of high-level radioactive waste is stored on site at the Pilgrim plant. It is estimated that this number will more than double if Pilgrim is allowed to operate for an additional twenty years. This waste poses a risk to the health of humans and ecosystems for centuries to come, but there are currently no clear disposal options outside of the state. Federal plans for storage are inadequate and new evidence suggests that plans for Yucca Mountain storage may not move forward. In recent months the Senate panel has cut requested funding for the program, and geologists have assessed the area and deemed it a complex geological area. This new information regarding Yucca Mountain clearly portrays major impediments to the progress of the project. Even if present plans for establishing a Federal Waste Repository at Yucca Mountain move forward on schedule, that facility would reach maximum capacity long before a re-licensed Pilgrim stopped generating waste. Plant owners and the NRC need to have a clear and safe plan for storage of radioactive waste before the extension is granted. In addition, current storage of spent fuel at the Pilgrim plant is unsafe. Spent fuel is stored in cooling pools that are highly vulnerable to accidents or sabotage and are located outside the primary containment area. These pools are less secure than the nuclear reactor and the radioactivity of these pools far surpasses that of the reactor's core. The removal of water from these pools could easily cause an uncontrollable fire releasing a devastating level of radiation into the surrounding area. Recent analysis by Dr. Gordon Thompson and Dr. Jan Beyea estimate the costs and latent cancers following releases of Cesium-137 from Pilgrim's spent fuel pool:

	10% release C-137	100% release C-137
Cost	\$105-\$175 billion	\$342-\$488 billion
Latent Cancers	8,000	24,000

This new knowledge of costs and risks associated with spent fuel storage must be analyzed thoroughly before considering re-licensing the Pilgrim Nuclear Power Plant.

Terrorism: The nation's nuclear facilities' vulnerability to a planned terrorist attack can no longer be ignored. Since the September 11th attacks, these concerns have come into greater focus. A recent study done by Large & Associates states that nuclear power plants are almost totally unprepared for a terrorist attack from the air. The study also noted that the probability of success of a deliberate attack is essentially 100%. (John H. Large, Large and Associates, "The Implications of September 11th for the Nuclear Industry," *Disarmament Forum*, vol. 2, 2003). This credible risk, which has not been thoroughly discussed, must be examined when discussing the re-licensing of the Pilgrim nuclear power plant.

Radioactive releases: The National Academy of Sciences BEIR VII report from July 2005 stated that there is no safe dose of radiation. Pilgrim's daily radiation emissions have been linked to increased rates of leukemia and thyroid cancers in towns around Plymouth (Morris, MS and Knorr, RS. Southeastern Massachusetts Health Study. Final Report. Boston, MA; Bureau of Environmental Health Assessment, Massachusetts Department of Public Health, 1990). In addition, new evidence indicates that on average, by 2030, nearly 1 in every 3 people in the Emergency Planning Zone will be 55 or over. (The Boston Metropolitan Area Planning Council Report on Population and Employment Projections 2010-2030, available at: http://www.mapc.org/2006_projections.html). This age group, which is currently increasing, is more susceptible to the effects of radiation (Richardson, DB and Wing, S. Greater Sensitivity to Ionizing Radiation at Older Age: follow-up of workers at Oak Ridge National Laboratory through 1990. *Int. Journal of Epidemiology*, 1999, 28:428-436.) It is necessary, when looking at the re-licensing of the Pilgrim Nuclear Power Plant, to look at both the increased knowledge of radiation effects, and these effects on an older population.

Once-through cooling system: The Pilgrim Plant's cooling system causes significant damage to the environment of Cape Cod Bay. Pilgrim uses a once-through cooling system, taking in nearly one-half billion gallons of water a day, and sending it into the Bay at 25 or more degrees hotter. An additional 20 years of operation at Pilgrim using this cooling system could kill billions of aquatic plants and animals. This cooling system also violates Section 316(b) of the federal Clean Water Act, which requires the plant to use the best available technology to minimize environmental impact. We believe that the plant must be held to the highest standards under the Clean Water Act, and a closed-cycle cooling system should be installed as soon as possible and certainly before the license extension is granted.

Based on the seriousness of these environmental impacts, we ask the Commission to include issues of waste accumulation and storage, terrorism, radiation release and impacts of the Pilgrim cooling system in its environmental review.

Sincerely,

Brian Thurber, Clean Water Action

Frank Gorke, MASSPIRG

Stephanie Abrahams, MASSPIRG

Sylvia Broude, Toxics Action Center

CC: <frank@masspirg.org>, <bthurber@cleanwater.org>, <sylvia@toxicsaction.org>**Mail**
Envelope Properties (44BBA9A6.A5C : 22 : 43612)

Subject: Pilgrim License Renewal Statement
Creation Date Mon, Jul 17, 2006 11:15 AM
From: "Stephanie Abrahams" <abrahams.s@hotmail.com>

Created By: abrahams.s@hotmail.com

Recipients

nrc.gov
OWGWPO02.HQGWDO01
HearingDocket (HearingDocket)

nrc.gov
TWGWPO04.HQGWDO01
AMY (Ann Young)

toxicsaction.org
sylvia CC

cleanwater.org
bthurber CC

masspirg.org
frank CC

Post Office

OWGWPO02.HQGWDO01
TWGWPO04.HQGWDO01

Route

nrc.gov
nrc.gov
toxicsaction.org
cleanwater.org
masspirg.org

Files

Files	Size
MESSAGE	7406
NRC Pilgrim Statement 7.17.06.doc	
Mime.822	60118

Size

Date & Time

Monday, July 17, 2006 11:15 AM
36864

Options

Expiration Date:	None
Priority:	Standard
Reply Requested:	No
Return Notification:	None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled