

African American Environmentalist Association

Testimony of

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Founder and President
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On the

Environmental Report

For a

Combined License (COL)

For the

Calvert Cliffs Nuclear Power Plant Site

Unit 3

Unistar Nuclear Operating Services, LLC
And
Constellation Generation Group, LLC

COL Application

Presented to the

**U.S. Nuclear Regulatory Commission
Division of New Reactor Licensing
Office of New Reactors**

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Introduction

My name is Norris McDonald and I am the founder and president of the African American Environmentalist Association (AAEA). AAEA, founded in 1985, is an organization dedicated to protecting the environment, enhancing human, animal and plant ecologies and promoting the efficient use of natural resources. AAEA includes an African American point of view in environmental policy decision-making and resolves environmental racism and injustice issues through the application of practical environmental solutions. AAEA supports the 40-year Combined License (COL) to build a new nuclear power plant adjacent to the Calvert Cliffs site.

AAEA believes the Calvert Cliffs site is an excellent location to build more nuclear power plants. We are not alone. On March 23, 2000, the U.S. Nuclear Regulatory Commission approved the application for a license extension, the first such award in the U.S. The license extension allows Unit 1 to operate until 2034 and Unit 2 until 2036. We know this is an excellent location because operation of Units 1 and 2 have had negligible negative effects on the Chesapeake Bay, except for possibly creating better fishing conditions near the facility. In fact the facility has been a net plus for the bay. No nitrogen loads or mercury, and no sulfur dioxide or carbon dioxide. Thus the operation of the facility for more than 30 years has not added smog forming or greenhouse gases to the environment. A new facility would only add to these benefits.

Constellation Energy Group (CEG) and Electricite de France (EdF) intend to build this new 1,600-megawatt reactor through a joint venture called Unistar at a location adjacent to the current Calvert Cliffs site in Lusby, Maryland. This is the equivalent of two large plants. Maryland and the Mid-Atlantic are in desperate need of additional electrical capacity. This need is only exacerbated by extremist proposals to shut down Maryland's coal-fired power plants. Although we compliment the Nuclear Regulatory Commission on streamlining the process for building nuclear power plants, we are frustrated that it still takes seven years to get a new plant built. Hopefully, the excellent operation of the current facility, the involvement of companies with excellent operational track

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records, and thorough environmental and safety reviews will lead to accelerated construction and operation of this plant design. Constellation Generation Group and UniStar Nuclear Operating Services are not owned, dominated, or controlled by foreign interests.

AAEA was the first environmental organization to support nuclear power. This public support started in 2001 and continues to this day. We are delighted that a new nuclear power plant is being planned for our Maryland. It is right in our back yard. That must make us a YIMBY (Yes in My Back Yard). Our organization headquarters is in Fort Washington, Maryland, about 40 miles from the facility. As a chronic acute asthmatic, I sleep very well knowing Calvert Cliffs produces emission free electricity. This comfort is increased with the knowledge that 103 other plants are doing the same thing in the United States. The fundamental reasons that AAEA supports nuclear power are:

- Nuclear power provides electricity safely and reliably,
- Nuclear power produces no smog forming emissions,
- Nuclear power produces no greenhouse gases,
- Spent fuel can be reprocessed for reuse,
- Yucca Mountain is acceptable as a repository for non-recyclable products,
- Nuclear power has an excellent quarter century safety record, and
- Nuclear power plants can use nuclear bomb warhead material as a fuel.

Calvert Cliffs is one of 103 other commercial nuclear power plants that provide 20 percent of our nation's electricity needs and 26 percent of the electricity generation in Maryland (EIA, 2003). During 2000, Mississippi's nuclear power plants avoided approximately 58,000 tons of sulfur dioxide emissions, 24,000 tons of nitrogen oxide emissions, and 2.47 million metric tons of carbon emissions.¹ The plants also avoided emissions of mercury. Avoiding these additional emissions is particularly important to areas that are experiencing air quality problems due to traffic and industry.

Partial License Submission

AAEA supports the partial license application process. We support the requested exemption by Unistar to submit this partial application because it will accelerate the process. Moreover, this accelerated process will be in conformance with revised regulations and will be helpful in producing an environmental assessment, which is required by 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments."

Submittal List

We have a question about the CCNPP Unit 3 COLA Submittal Contents Packing List. In Box 4, Title VII, Emergency Plans, a Prince George's County binder is not included on the list. There are binders for other jurisdictions, including: District of Columbia, State of Delaware, State of Virginia, Calvert County, Dorchester County and St. Mary's County.

Decommissioning

AAEA is confident that these two companies have the resources to decommission the facility when the time comes. Hopefully that will be near the end of this century. The guaranteed \$378 million for the waste vendor options seems reasonable to us.

Geography and Demography

The Chesapeake Bay is one of Maryland's greatest resources. So is the nearby Patuxent River. These two water bodies have not been negatively affected by the current operation of two units and would not be negatively affected by the operation of the equivalent of two more units. The crabs and fish in the Chesapeake have many other threats, but nuclear power plants are not among them. The facility will not add nitrogen into the bay.

The population analysis appears to be very good. Prince George's County is left out of the analysis. Is there a reason Prince George's is left out of the population analysis?

According to submittal, the population will triple by 2060 within 10 miles of the facility. The environmental consequences of this growth alone has bad

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implementations for the Chesapeake Bay and the surrounding area. The analysis estimate of moving from almost 50,000 to nearly 150,000 will require significant additions of electrical capacity. To the extent it is emission nuclear, that will be good for the local environment. The population within 50 miles is expected to double from about 3 million to about 6 million by 2060. This facility would be the best environmental alternative for helping to meet this new demand.

The maps are very detailed and provide very good information for citizens and researchers.

Meteorology

This section is very helpful. It is very informative. Maryland is in the midst of another summer drought. We are also having the usual August heat waves. Electricity demand in the state stands at a crossroad. This crossroad has utility companies balancing electricity demand and emissions reductions. It is quite a challenge. Global warming is already having effects in Maryland. Additional nuclear capacity will only serve to mitigate smog and global warming.

Cooling Towers

The construction of cooling towers will reduce any additional effects on the bay. Although once through would probably be sufficient at this location, the cooling tower scenario also represents good available technology.

Conclusion

AAEA supports the COL for the Calvert Cliffs location. AAEA will submit additional comments on the environmental report for the record.
