

Gallagher, Carol

From: Jessie Collins <jessiepauline@gmail.com>
Sent: Friday, August 29, 2014 4:00 PM
To: Perkins, Leslie; Gallagher, Carol; Bladey, Cindy
Subject: comments re: Fermi 2, NRC-2014-0109
Attachments: commentsf2.docx

Greetings,
Please find my personal comments in the Enrico Fermi Unit 2 license extension process.

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Jessie Pauline Collins

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29 August 2014

To: Leslie Perkins, NRC; Carol Gallagher, NRC; Cindy Bladey, NRC

Re: Personal Comments in the Enrico Fermi Unit 2 license extension application
Docket No. 50-341; NRC Docket 2014-0109

Greetings,

Although I submitted a Petition for Leave to Intervene and Request for Public Hearing on behalf of Citizens' Resistance At Fermi Two (CRAFT), I now wish to submit my personal comments, which may contain statements not sanctioned by the general CRAFT membership or steering committee. However, I wish to express my frustrations at the NRC's continually collaboration with the nuclear industry to avoid public oversight and input into what's in the best interest of future generations.

Earlier this month, thousands of people in the vicinity of the Fermi 2 nuclear reactor could not drink their water because of poison algae growth. And yet, back in 2011, the NRC stated, "Public and occupational health can be compromised by activities at the Fermi site that encourage the growth of disease-causing micro-organisms (etiological agents). Thermal discharges from Fermi into the circulation water system and Lake Erie have the potential to increase the growth of thermophilic organisms. These microorganisms could give rise to potentially serious human concerns, particularly at high exposure levels." (Draft NUREG-2105, Vol. 1, 10/2011, page 2-228)

So if the NRC knew in 2011 that DTE's discharges could poison the water, why did they let them? For profit, or were they/you covering the legal liability laws by declaring you make the potential degradation public, but hoping no one noticed. Your agency added in that same document, "Recent studies of the effects of climate change indicate that there could be declines in the overall Lake Erie water levels of 1 to 2 m (Hartig et al 2007). There are no known studies of potential future surface water use in the Lake Erie Basin or the entire Great Lakes Basin." (p. 2-25) Maybe you couldn't see a future for the Lake at the rate its being poisoned.

Groundwater was also noted to be affected back in 2011, "In wells within a 5-mile radius of the Fermi site, elevated concentrations of arsenic above the EPA (2009a) maximum contaminate level (MCL) were found in groundwater samples (Detroit Edison 2011a). p. 2-29

Enough of what was said – and seemingly discounted back in 2011, I now wish to focus on the present. CRAFT filed 14 contentions on August 18th, and one of them (No. 3, NRC Cannot Legally Extend Reactor Licenses) was cancelled before the week was out. This legality was referred to during the Fermi 3 licensing hearing, "the NRC will not issue the COL prior to completion of the ongoing rulemaking to update the Waste Confidence Decision and Rule." One is then referred to Sec. 6.1.6 which deals with radioactive waste. There, it states (p 6-16) "On June 8, 2012, the US Court of Appeals for the district of Columbia circuit vacated the 2010 waste confidence decision and rule, finding that it did not comply with the NEPA."

The NRC then proceeded to have Waste Confidence hearings all around the country, before they made a new law saying they can now license new reactors, and extend operating licenses for the aged reactors. I can't help but remind people that everything the Nazis did was legal. They merely changed the laws to justify their actions.

Now, within days of one new law to legalize the continued poisoning of our biosphere in place, your agency has started on another law change to suit the industry's needs – and knock out another of CRAFT's contentions, No. 7: Aging Management Plan Does not Adequately Inspect and Monitor for Leaks. I refer to the July 29, '14 meeting between NRC Staff, Nuclear Energy Institute, and "various representatives from the industry" (including DTE) to change the guidelines for plant reporting including a "new category for age-related degradation." And does this improve the safety of aging nuclear reactors?

No, it doesn't, and I quote the Aug. 22, '14 document. "The NRC and industry are in alignment on the identifications of the major technical issues for operation from 60-80 years, but the NRC does not see from the roadmap that all of the technical issues will be addressed in time for the first SLR application."

As David Schonberger so aptly put it, "The gist of this is that we need to learn a new term: "SLR," or Subsequent License Renewal. SLR refers to the roadmap for issuing License Renewals for the 60 - 80 year timeframe of operations. The NRC Staff meeting included representatives from NEI and all of the major nuclear utility companies, including DTE Energy. Take note that DTE's participation indicates that DTE will probably apply for a Subsequent License Renewal (SLR) for Fermi, Unit 2 in order to extend the reactor's licensed life for the 2045 - 2065 timeframe. The notes from the meeting indicate that there are still technical hurdles to work out before the NRC is ready to approve a Generic Aging Management Program to apply to SLR relicensing actions --- however, the NRC and NEI are engaged in what the NEI calls "structured coordination," moving full-speed ahead to develop the technical basis for eventually approving U.S. fleetwide 80-year reactor lifetimes."

Could it be that the Nuclear Energy Institute is the puppet masters of NRC, and that they both want to quickly implement a generic process on the Aging Management Program? Are they basically looking to streamline and lock out site-specific concerns by redefining aging degradation as generic? Is the next step getting blanket approval from the NRC to do so? That would eliminate our Aging contention, as well as lock out the public, and create an illusion that these Aging problems are adequately dealt with. And is the rhetoric about 60-80 years designed to alleviate any concerns the public has by raising the numbers from 40 to 60 years?

Since the inception of the Manhattan Project, government has been shielding the nuclear cartel from public knowledge and in-put. That needs to change, and the time for change is now.

Sincerely,

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