

6/30/2014
79FR 36837

Dear Ms. Leslie Perkins
Environmental Project Manager
Office of Nuclear reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555 -0001

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RULES AND DIRECTIVES
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August 28, 2014
Re; docket #I.D. NRC- 2014-0109
DTE Fermi 2 re-license

The Sierra Club Michigan Chapter enters the following comments concerning the proposed 20-year re-license for continued operation of the Fermi 2 nuclear reactor. Because of the long time line of proposed operation until 2045 and the prospect of an additional 60 years allowed for decommissioning, much care must be taken to determine the environmental impacts for at least 90 years from now (until 2105 and possibly beyond).

As a result multiple scenarios must be considered;

1. Health and ecosystem impacts on the Monroe and Frenchtown Township drinking water from radioactive releases of normal operations, refurbishment and transport of large components.
2. Assuming that the recent NRC plan to allow storage of rods in on site pools with stands court challenges, what effect does this present for the 600 tons already stored since the reactor started operation in 1988. 600 tons is beyond the design capacity now, so if DTE is unable to transfer them to outside dry casks, what plan and impacts are there for continued production of this high level waste. It is our understanding that DTE's plan to transfer the high level waste to dry casks is impaired because of defective welds.
3. If no final disposal site is developed or the disposal is projected for far into the future and DTE needs to transfer the waste to outside casks, detailed analysis must be performed.
4. The impact of storage and transport of low level and intermediate level radioactive waste must also be considered.
5. Overriding all of these concerns is the ongoing crisis of global warming and it's effect on Lake levels and more severe weather events that are predicted.

SUNSI Review Complete
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Add= L. Perkins (LTP1)

Thank you for considering our comments and we hope to review draft and final documents when available.

Ed McArdle, Michigan Chapter Co-Chair of the Conservation Committee
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