

## TurkeyPointCEm Resource

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**From:** david fairchild [fairch@cruzers.com]  
**Sent:** Thursday, May 07, 2015 12:51 PM  
**To:** TurkeyPointCOLEIS Resource  
**Subject:** Turkey Point Proposal comment letter from David Fairchild

NRC staff:

As the grandson of David Fairchild, a regional planner, and a former resident of Coconut Grove, I would like to comment on the Florida Power and Light (FPL) expansion proposal for Turkey Point, a project that requires your approval. The project proposed is adding two new nuclear reactors to the existing older nuclear power plant, plus many miles of new 100 foot tall steel transmission lines throughout Miami-Dade County to the City of Miami.

FPL must claim the two new nuclear reactors are the most environmentally acceptable alternatives for providing the additional power needed on the grid in the area. They also must claim the proposal's benefits outweigh its costs. Both these claims, however self-serving to FPL in its desire to make profit, or at least spend, taxpayer monies, are entirely false, as I will document below. I recommend that you disapprove any further processing of their Turkey Point Nuclear Power plant expansion proposal for the reasons summarized below.

1. The National Oceanic and Atmospheric Administration (NOAA) recommends that new power plants account for three feet to 6.6 feet of sea-level rise. FPL's application proposes to accommodate only one foot of sea-level rise over the proposed 60-year project life.

2. The proposal is not the most environmentally acceptable alternative. FPL has not adequately evaluated other, more cost-effective alternatives to produce electrical energy which do not add the risk of nuclear waste storage at a highly flood and wind prone site. Alternatives for new energy production abound, but were not evaluated based on the falling prices of solar power due to the introduction of new battery technology. Furthermore, FPL has not evaluated other alternatives including energy conservation and efficiency, at one-fifth the cost of new nuclear power generation, thereby concealing how those alternatives, with conservation included, would cost less and have far less public health and hurricane damage risk than this proposal. This \$20 billion project you could only approve by ignoring or deliberately hiding the fact that better, cheaper, safer and more environmentally acceptable alternatives to new power production are available now or in the near future for Southern Florida.

3. Nuclear plants consume vast amounts of water to keep reactors cool. FPL claims the new primary cooling system will use reclaimed wastewater, but that water is sorely needed for other uses. The project will increase usage of all Miami-Dade's available water by ten times, from one to 10 percent of supply, a massive impact for which there is no mitigation, in view of the projected skyrocketing forecast of water demand and declining water supply in the region. The project's assessment of its claim on fresh and salt water in the region is inadequate, failing to assess the loss it would cause to water needed for a rapidly growing population and severely threatened habitat in the coastal Everglades, Biscayne National Park, and South Dade County generally.

4. The proposed project includes massive new transmission lines through Everglades National Park and the heart of Miami-Dade's densely populated commercial and residential areas on 105-foot tall steel towers. The towers would deface Dixie Highway and traverse residential neighborhoods in Pinecrest, South Miami, Coral Gables, Coconut Grove, and then go along Brickell Avenue on their way to downtown Miami. Apart from their appalling visual impacts, these lines would remove tens of millions annually from the county's tax base. Worse, FPL -- evidently to save costs -- proposes erecting those transmission towers without meeting Florida State hurricane safety standards. FPL did not adequately evaluate the risk of those towers buckling during the region's relatively frequent hurricane force storms. Their location would almost certainly risk those transmission lines and towers falling onto the adjacent MetroRail and surrounding homes. The costs in life and property, not to mention of disruption of transportation and electrical service during the aftermath of a storm would be catastrophic. This cost was not adequately assessed by FPL in their proposal.

5. FPL's proposes operating the new reactors for 60 years, or at least until 2080. One foot of sea-level rise will certainly occur during that time frame, inundating the area surrounding Turkey Point and turning the power plant into an island, possibly flooding radioactive waste storage facilities and releasing radioactivity into the surrounding water during storm surges. The proposal fails to adequately assess that risk. The proposal fails to use the latest and most authoritative forecasts of sea-level rise at the site, nor the probability of storm surges releasing radioactive waste storage there. FPL's assertion that the new reactors will be safe from storm surges does not properly account for these and other impacts to the plant from expected sea level rise plus storm surges heights at the site.

6. Finally, the proposal assumes that future growth in demand for electricity must be supplied from the grid. Rapid evolution in the technology needed to locally generate power from solar, wind and wave sources, together with scalable on-site battery storage make that assumption obsolete. The basic justification for this project is a dubious need for large amounts of grid delivered power. That justification must now be reassessed in light of current or soon available new technologies enabling local, non-grid based power generation.

Thank you for providing this opportunity to comment. I look forward to reading your response.

Sincerely,

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David Fairchild

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