



# Nuclear Energy Information Service

*Illinois' Nuclear Power Watchdog since 1981*

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## Initial Comments on the LaSalle NPP License Renewal [Docket Nos. 50-373 and 50-374; NRC-2014-0268]

March 22, 2016

Nuclear Energy Information Service

**Comment : Analysis of socio-economic impacts are incomplete. No analysis of impacts of early or unexpected closure are considered or provided.**

The Exelon Safety Evaluation Report (SER) documents a significant tax impact for the presence of the LaSalle Nuclear Station, yet only addresses the positive impacts. No mention or analysis of negative impacts resulting from abrupt, planned, or unexpected early closure of LaSalle is presented. This is a significant omission, particularly in light of Exelon Corporation's threat of two years ago to close reactors in Illinois on economic grounds.

According to the Exelon SER LaSalle represents a sizeable portion of the County total tax base, It also accounts for large portions of the School District's adjusted property tax levy. These are not insignificant amounts. Their abrupt disappearance would wreak economic havoc on the affected governmental and essential service entities' ability to operate – just as Exelon's predecessor ComEd did to the community of Zion in 1997 when they unilaterally closed the Zion reactors..

The SER either fails to recognize or mention at all some of the possible events that could result in such a closure situation:

- Unexpected major accident, resulting in immediate and presumably premature closure
- NRC-ordered shut down
- Exelon's unilateral decision to close the plant on economic or other grounds, as it did at Zion, resulting in an immediate loss of about 55% of Zion's tax base
- Devaluation through sale, as occurred at the Clinton station, resulting in enormous loss of tax base
- Eventual old-age, license expiration closure (the outcome most hoped for)

Exelon being a business will certainly make the calculations it made when it closed Zion, and decide if LaSalle should continue to operate.

In this omission the SER makes the same mistake the U.S. Government made when it invaded Iraq – **it had no exit strategy**. To simply assume that the only socio-economic effects of LaSalle's presence will be positive ones is simply irrational.

**Recommendation:** *Planning for some kind of eventual closure must be made long before it happens to minimize economic and service disruptions to the entities whose tax base will be affected. Debate about the license extension serves as a good reminder of this fact, and an opportunity to take action. We recommend that dependent governmental and taxing entities begin formal negotiations with Exelon to establish an escrowed "closure mitigation fund," based on some mutually agreeable assessment and payment structure, so that dependent entities will have some kind of temporary funds available to soften the economic blow of closure, and not radically disrupt essential services.*

SUNSI Review Complete

Template = ADM – 013

E-RIDS= ADM-03

Add= W. FORD (whf)

4/11/2016  
81 FR 7378

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***Comment: Inadequate attention paid to water availability of the LaSalle NPP under potential future climate disruption conditions.***

Historically, the LaSalle NPP has been one of the Illinois reactor sites most sensitive to water availability under severe drought conditions (e.g., 1998; 2005; 2006). It's siting on a portion of the Illinois river network that is shallower than other parts has brought the reactors close to mandatory shutdown to stay within EPA regulatory limits for thermal pollution during extreme droughts on more than one occasion over the past two decades.

Forecasts for the future of Illinois' climate over the next few decades indicate it approaching that of current-day West Texas. This will have severe impacts on the aquatic systems in the area; and on the availability of water for intake and discharge for LaSalle.

A more thorough re-examination of LaSalle's ability to safely operate, obtain sufficient cooling water, and not thermally and radiologically damage the local aquatic eco-system is in order in this relicensing proceeding.