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Notice of Intent to Conduct Scoping Process and Prepare Environmental Impact Statement NextEra Energy Point Beach, LLC; Point Beach Nuclear Plant, Unit Nos. 1 and 2

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Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement; NextEra Energy Point Beach, LLC; Point Beach Nuclear Plant, Units 1 and 2

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General Comment

Point Beach Units 1 & 2, in Two Rivers, WI, on the Lake Michigan shoreline. NRC file photo. Point Beach Unit 2 has the worst-embrittled reactor pressure vessel of any pressurized water reactor in the country. Decades of additional neutron radiation bombardment will only increase the risk of a pressurized thermal shock, through-wall fracture, core meltdown, and catastrophic release of hazardous radioactivity.

To give an idea of how catastrophic, in terms of casualties and property damage, consider the U.S. Nuclear Regulatory Commission's (NRC) own CRAC-II report. CRAC is short for Calculation of Reactor Accident Consequences. It is also known as "Technical Guidance for Siting Criteria Development," the 1982 Sandia (National Laboratory) Siting Study, NUREG/CR-2239, and/or SAND81-1549.

In the event of a core meltdown at Point Beach 2, CRAC-II predicted: 500 peak early fatalities (acute radiation poisoning deaths); 9,000 peak early (radiation) injuries; and 7,000 cancer deaths (latent cancer fatalities).

In terms of property damages, CRAC-II predicted \$43.8 billion, expressed as Year 1982 dollar figures. When adjusted for inflation alone, this figure would now be \$119 billion, in Year 2020 dollar figures.

And as Associated Press investigative journalist Jeff Donn reported in June 2011, in the aftermath of the beginning of the Fukushima Daiichi nuclear catastrophe in Japan, in his four-part series "Aging Nukes," populations have soared around U.S. nuclear power plants like Point Beach, so casualty figures would now be even worse than CRAC-II predicted nearly 40 years ago.

Donn also cited neutron radiation embrittled reactor pressure vessel pressurized thermal shock risk as the top example of NRC regulatory retreat in the past number of decades.

And as Fukushima has also shown, reactor meltdowns can proceed domino effect at multi-reactor sites. A meltdown at Unit 2 could lead to a meltdown at Unit 1, or vice versa, in which case those casualty and property damage figures above would have to be doubled.

On slide #9 in its slideshow, NRC stated that Operating Experience (OE) is one of several bases for NRC's Safety Review of NextEra's proposal to operate Point Beach for 80 years.

Point Beach's OE leaves a lot to be desired. This century, the two reactors at Point Beach, in certain years, had a majority of the NRC's "red findings" -- the agency's highest safety violation designation, amongst the entire U.S. fleet of operating reactors -- then numbering 104 -- combined.

Similarly, at the very same time, WI's Kewaunee reactor -- a short distance from Point Beach (about the same distance as between the now infamous Fukushima Daiichi and Daini nuclear power plants in Japan) -- had a majority of the NRC's "yellow findings," the agency's second highest risk designation, more than the rest of the 103 operating reactors combined.

Kewaunee's permanent closure was announced in late 2012, and implemented in early 2013. In fact, Kewaunee's closure commenced a record-breaking number of atomic reactor shutdowns across the U.S. since.

Another such reactor that has closed for good, Fort Calhoun in Nebraska, was given a red finding in the aftermath of a climate change-induced natural disaster: historic flooding on the Missouri River in the spring and summer of 2011. Fort Calhoun never recovered, and was permanently shut down.

Given Point Beach's very bad OE, and the ever increasing risks of breakdown phase age-related degradation accidents and disasters, shouldn't Point Beach simply be shut down for good, and replaced with safer, cleaner, more secure, more affordable renewables sources, such as wind power and solar power, as well as efficiency and energy storage, such as batteries and compressed air energy storage? This is readily achievable, considering the decade or longer left on the two Point Beach reactors' 60-year operating licenses. A decade or longer is plenty of time to achieve such a just energy transition in WI. Especially so, when considering that WI hosts the cutting edge Midwest Renewable Energy Association.