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Docket: NRC-2020-0277

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

Comment On: NRC-2020-0277-0001

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

Document: NRC-2020-0277-DRAFT-0117

Comment on FR Doc # 2021-02001

Submitter Information

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Organization: LEAF of Hudson Valley

General Comment

Our comments are attached.

Attachments

LEAF Point Beach comments



LEAF

Legal Environmental Advocacy Fund

March 1, 2021

Docket ID NRC-2020-0277

RE: Scoping – EIS NextEra Energy Point Beach,
LLC Units 1 and 2.

This application to grant a new license to operate Point Beach for 40 more should have been denied prior to scoping and preparation of an Environmental Impact Statement as it is highly unreasonable and excessive.

ISSUES AND STUDIES TO BE INCLUDED IN SCOPING

- Corrosion, Degradation, and Embrittlement caused by the constant radioactive bombardment on the steel and concrete structures, pipes, and wiring.
- Full Physical Structural Inspection of all structures, including understories and containment structures and insulation.
- Full list of exemptions, exceptions, relaxations, and amendments to design basis standards have been granted over the life span of both reactors.
- As built drawings of the current state of both the reactors.
- Full analysis of aging management programs.
- Evaluation of historic and current radiation monitoring reports for both reactors
- Full history of SCRAMs for both reactors.
- Thermal Pollution impacts on Lake Michigan – including calculation of total amount of thermal pollution in BTUs produced over the operating life of each reactor, and projected additional 40 year period, and impact of this heat on algae blooms and species die off.
- Radiation Pollution impacts on Lake Michigan – test large sampling of fish bones for strontium-90, and tritium levels. Test river bed for radioactivity in the sedimentation.

- Evaluate risks to all communities which rely upon Lake Michigan and its rivers for their drinking water supplies.
- Cost analysis of clean up in event of a catastrophic failure over the next 40 years for each reactor, compared to insurance provided by Price Anderson, including assessed property value study in 50 mile radius.
- Geological and Seismological studies with 40 year projections.
- Evacuation plans for projected population in 40 years within 50 mile radius.
- Cyber security and terrorist threat analysis for the next 40 years
- Economical impact of continued operation of nuclear reactor vs. renewable energy development and conservation. Extending the life of aging, corroded and compromised reactors economically
- Analysis of projected water levels and shore line changes due to rising water levels.
- Provide a safe nuclear waste plan for the existing nuclear waste and 40 years of additional nuclear waste, and safe storage for the next 24000 years.

Reactors are only designed to have a life span of no more than 40 years.. Design basis standards of a 40 year operating life is designed to protect public health and safety. The older a reactor, the higher the risk of failure. The NRC should not even be considering a 100% increase in the life span of these reactors.

Doubling the life of these reactors was never contemplated when they were first licensed – and since a new license must be issued – a full environmental assessment including geological and seismological studies projecting 40 years into the future should be conducted.

Failure to conduct the above studies would be both dangerous and a violation of the Administrative Procedures Act.

The NRC should NOT have even considered this application, as the size of the request 100% increase. Such a large exemption from Design Basis ignores the carefully engineered plans established by nuclear physicists. It also ignores all “lessons learned” and ignores the reality of physical evidence of rapid decay to nuclear reactor components.

The GREAT LAKES provides the water supply to large part of our nation. The NRC has a legal and moral responsibility to ensure that its charge, the Nuclear Industry, will not be responsible for toxic contamination of America's water supply.

Nuclear energy is not a solution to climate change – it is part of the reason of climate change. The NRC sole job is to protect the United States from the dangers of domestic nuclear reactors.

At Chernobyl the containment must be repeatedly rebuilt due to the highly corrosive nature of radioactive bombardment. And, Fukushima, now 10 years ago, is still out of control. Closer to home in America, the nuclear waste messes at Hannaford, and in West Valley remain unresolved and unresolvable.

The requested exemptions to allow the Point Beach reactors to operate for another 40 years is excessive, unreasonable, and irrational and unscientific.

Please do not abdicate your authority to regulate. Please do not grant an 80 year operating license for the Point Beach reactors, 1 and 2. Thank you.

Susan Shapiro, Esq.