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# PUBLIC SUBMISSION

**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

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## General Comment

I request that the EIS address the consequences of a nuclear reactor accident (on the continuum from excess radiation leaks to meltdowns) for each Point Beach Unit and as well as an accident that effects both units for the surrounding communities within a 50-mile radius and for Lake Michigan and Great Lakes watershed.

- The Wisconsin Division of Health Services (WI DHS)

<https://www.dhs.wisconsin.gov/library/P00442.htm> needs to make radiation monitoring available to the public for the past 3 years (2018-2020). Currently there is only monitoring data available up to 2017.

- NextEra in conjunction with the WDHS should include monitoring of air, soil and water during refueling cycles for Point Beach's 2 units (this occurs every 18 months for each unit) as this is the time that excess radiation releases occur and this would be particularly important to vulnerable populations (such as pregnant women, infants and small children), particularly those living and working within the 5 mile radius of Point Beach Nuclear Power Plant.

- Updated Evacuation plans from NextEra (now out of date from 2018 on the Manitowoc County website and link broken for Kewaunee County) need to be both provided to those who live, work and go to school/daycare within the 50 mile radius of Point Beach Nuclear Power Plant.

- Have families and workers (who could be exposed during an accident) been given information about safe use of Potassium Iodide and will it be provided?

- Is there a plan for evacuation of specific events in the 50 mile radius, such as an accident during a Packer game (81,441 people) at Lambeau Field in Green Bay?

- How will campers and swimmers utilizing recreation at Point Beach State Forest Beach and Campground be notified and evacuated if there is excess release of radiation or an accident? Should these people (staff, swimmers, and visitors) also be notified when fuel rods are exchanged and there may be

excess radiation release into air and water?

- Is there a plan to track, monitor and treat anyone who has been exposed to excess radiation during an accident? This would also include information on who will bear responsibility for the cost of this monitoring and treatment over the exposed population's lifespan.
- The analysis of a reactor meltdown effect on the human environment is expected in the EIS. This credible scientific evidence relative to assessing the impact of this catastrophic scenario is within the rule of reason and now reasonably available given the incidents at Chernobyl and Fukushima Daiichi nuclear facility. NEPA requires this analysis per 40 CFR 1502.22.

(<https://casetext.com/regulation/code-of-federal-regulations/title-40-protection-of-environment/chapter-v-council-on-environmental-quality/part-1502-environmental-impact-statement/150222-incomplete-or-unavailable-information>) and (4) the agency's evaluation of

such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. For the purposes of this section, "reasonably foreseeable" includes impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason.