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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

(Beyond Nuclear, comment #6, part 1 of 2)

If 800 metric tons, or more, of highly radioactive irradiated nuclear fuel (likely to be high burnup, to boot -- thermally hotter, more radioactive, and more brittle) is permitted to be generated at Point Beach Units 1 and 2 over yet another 20 years of operations (not the currently approved 60 years, but a total of 80 years at each reactor), this will exacerbate the challenges and risks of managing the high-level radioactive waste.

For example, in its Feb. 2002 Final Environmental Impact Statement for the proposed Yucca Mountain, Nevada high-level radioactive waste dump, the U.S. Department of Energy (DOE) proposed barging Point Beach's irradiated nuclear fuel, on the surface waters of Lake Michigan, down to the Port of Milwaukee. There, it would be transferred onto trains, for shipment out to Western Shoshone treaty land in Nevada, against the Indigenous Nation's will.

DOE predicted up to 217 casks of irradiated nuclear fuel, being barged from Point Beach to Milwaukee. (For documentation of this figure, and additional points below, see: <<http://archives.nirs.us/factsheets/mibargefactsheet92804.pdf>>. But in DOE's FEIS, it assumed only 50 years of operations at each of the Point Beach reactors. Ironically enough, that is right about how old the two reactors are at Point Beach. Unit 1 is a bit older than 50 years, and Point Beach 2 a couple years younger than 50.

So, for each and every year, from now on, that Point Beach operates, about 40 metric tons, or more, of additional irradiated nuclear fuel will be generated, more than DOE predicted when it assumed Point Beach would close for good at age 50.

This means that DOE's estimate of 215 barges of high-level radioactive waste on Lake Michigan, originating at Point Beach, could be a significant underestimate.

NRC has already approved 60 years of operations at Point Beach, 10 years longer than DOE assumed.

Now Point Beach has requested another 20 years of operations, for a grand total of 80 at Point Beach. NRC seems all too willing to rubber-stamp that request, despite widespread public opposition.

Each barge shipment represents a roll of the die, that could come up snake eyes. Each barge shipment is a potential Floating Fukushima, a potential Mobile Chernobyl, a potential Dirty Bomb on the waves, traversing the surface waters of Lake Michigan. (Fukushima's 10th annual commemoration will be on 3/11/21; Chernobyl's 35th annual commemoration will be on 4/26/21; although Fukushima was a triple meltdown of reactors, and Chernobyl a reactor explosion and fire, irradiated nuclear fuel -- as would be barged from Point Beach on the surface waters of Lake Michigan -- is the same material that melted down at Fukushima, and exploded and burned at Chernobyl.)

If even a fraction of the contents of a single cask were to be released into Lake Michigan during such a barge ship, whether due to accident or attack, it would spell unprecedented radiological disaster for the Great Lakes downstream. The Great Lakes are the drinking water supply for 40 million people in 8 U.S. states (7 of them downstream of Point Beach and Milwaukee -- the only state not downstream is MN, which borders Lake Superior), 2 Canadian provinces, and a very large number of Indigenous Nations on both sides of the U.S./Canadian border. That only counts this generation. The Great Lakes will continue to serve as the drinking water supply, and so much more, for countless numbers of people, into the future.

(Continued at Beyond Nuclear, comment #6, part 2 of 2)