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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

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

See attached file(s)

Attachments

Point Beach License Renewal EIS Comments-03032021

Docket ID NRC-2020-0277
Point Beach License Renewal Environmental Impact Statement Scoping Comments
March 3, 2021

I am providing the following comments on the proposed Point Beach License Renewal Environmental Impact Statement (EIS). My husband and I are Alliant Energy customers and farm on our land in southwest Wisconsin that has been in our family for 49 years. I am deeply concerned about the existential threat of climate change and the need to reduce carbon emissions. Renewing the Point Beach Nuclear Plant license, however, would potentially create more problems.

Alternative Analysis

- The EIS should delineate the impact of the no action alternative. What are the socio-economic costs to close the plant, return the land to its previous state, and safely maintain spent fuel storage forever? Who will pay these costs?
- The EIS should include a thorough cost-benefit analysis, comparing other means of power production (such as clean, safe, renewable wind and solar sources and distributed generation technologies), increased energy efficiency, and other enterprises as a viable alternative to renewing the license and continuing operation of the nuclear power plant.
 - According to the Sierra Club, “Nuclear power has been subsidized throughout most of its fuel chain. In 2011, the Union of Concerned Scientists published *Nuclear Power, Still Not Viable without Subsidies*. This report shows that in some cases subsidies were greater than the value of the electricity produced.”
 - Both the Sierra Club and Beyond Nuclear cite *Carbon Free and Nuclear Free: A Roadmap for U.S. Energy Policy*, by Dr. Arjun Makhijani. In the book he points out that the U.S. could replace fossil fuels and nuclear power by 2050, and he has conducted subsequent statewide analyses to illustrate how this can be accomplished.

Waste and Storage

- The EIS should specify how the storage of additional spent fuel, reactor rods, and other waste from 20 additional years of operation will be securely and safely accommodated.
 - How is storage protected from floods, fires, earthquakes, terrorist or enemy attacks, and other hazards?
 - What age-related issues and problems with waste storage can be expected?
 - How will the dry cask storage sites be securely maintained over time? How will increases or decreases in lake levels (due to flooding, erosion or other events) affect the aging system?
 - What measures will be taken to ensure that water level fluctuations do not affect the reactors or storage units?
 - Will the density of spent fuel rods in the storage pools be increased over the next 20 years? If so, what additional measures will be implemented to maintain the cooling system and prevent leaks?
 - If spent fuel is transported to other storage sites, by barges or over land, how will risks to the environment be minimized?
- The long term storage of radioactive waste is an unresolved problem which presents world-wide risks to public health and the environment for hundreds of thousands of years. According to Kevin Kamps, Radioactive Waste Specialist at Beyond Nuclear, the 20 year extension would result in the generation of an additional 800 metric tons of high level radioactive waste.

Accidents and Releases

- The EIS should address how NextEra will assure that past operating experience problems at Point Beach have been rectified and that future operations will be safe and secure.
 - According to Beyond Nuclear, out of all the reactors in the U.S. since 2000, there were specific years in which the two Point Beach reactors had the majority of red findings, the NRC's highest safety violation category.
 - According to Amy Schulz, RN, President of Physicians for Social Responsibility Wisconsin, "The Point Beach reactor #2 is one of the most embrittled reactors in the U.S. due to its age and materials, making it vulnerable to cracking and the release of radiation in the event of an accident. The Nuclear Regulatory Commission estimated that the Point Beach 2 reactor was to reach its 'embrittlement screening limit' by 2017. (Zipp, 2014)"
- The EIS should address an additional 20 years of ageing structures, mechanisms and parts.
 - According to Beyond Nuclear, most reactors in the U.S., including Point Beach, have received approval to operate for a total of 60 years. Extending this time by 20 years to total 80 years at Point Beach increases the risk of radiation leaks and accidents.
 - Kevin Kamps at Beyond Nuclear states that operation for 20 more years will increase the risk of a "pressurized thermal shock through-wall fracture, core meltdown, and catastrophic release of hazardous radioactivity."
- The EIS should describe the complications involved in an accident, ranging from a radiation leak to a meltdown, for one and for both Units. The description should include impacts on public health, individual people, and communities in a radius of 50 miles, as well as impacts on the ecosystems in the surrounding environment, Lake Michigan, and the Great Lakes Watershed.
- The EIS should include a plan for NextEra and the Wisconsin Department of Health Services to monitor radioactivity levels in air, water, and soil; including data collected during refueling cycles.
 - Radiological data should be accessible to the public in a timely manner. Data for 2017 is the most current at this time. Data for the past 3 years (2018-2020) should be made available.
 - Should the public be informed at the time of refueling cycles and be made aware of the risks for release of excess radiation in the air and water?
- The EIS should address "normal/acceptable low level discharge" and accidental radiation releases into Lake Michigan and into groundwater. How will possible impacts on lake water and groundwater for the surrounding communities, rural residents, and farming operations be rectified?
- NextEra needs to provide updated evacuation plans for everyone who has a home, farm, works, or attends school or childcare within a 50 mile radius. Additional evacuation plans should be assured for people attending specific events (e.g. Green Bay Packer games) and people at Point Beach State Forest Beach and Campground.
- NextEra should assure that everyone who would potentially be exposed to excess radiation in an accident has been provided with instructions for using potassium iodide and that the treatment would be provided to them.
- NextEra should provide a follow up plan for everyone exposed to excess radiation if there is an accident. This should include treatment, monitoring, and covering the costs over their lifetime.
- The EIS should address the socio-economic impacts of an accident on the surrounding area. The analysis should include effects on family income, housing, property values, businesses, agriculture (including farms with contaminated land, crops, and livestock), commercial fishing, historical and cultural sites (particularly sites of significance to indigenous peoples), recreational use, tourism, aesthetics, and local, county and state tax revenues. If an accident takes place, would NextEra provide sufficient compensation?

Harm to the Ecosystem

- The EIS should describe how NextEra will monitor water discharge and mitigate negative impacts on water quality for optimal public health and environmental sustainability.
 - Amy Schulz, RN, President of Physicians for Social Responsibility Wisconsin points out that Lake Michigan “supplies drinking water to millions of people in the U.S. and Canada. In the event of an accident, the radioactive contamination could be catastrophic.”
 - According to a Sierra Club fact sheet, “Nuclear reactors need enormous amounts of cool water to continually remove heat from their cores....Cooling causes serious damage to aquatic life, killing millions of fish and untold numbers of macroinvertebrates, aquatic eggs and larvae.”
 - The Point Beach Nuclear Power Plant relies on the water in Lake Michigan, instead of cooling towers, to remove waste heat. The increased water temperature has had significant ecological impacts on the Lake Michigan ecosystem since 1970.
- The EIS should describe the negative impacts on phytoplankton and zooplankton that contribute to decreased food sources for higher order species. How will an additional 20 years of operation affect these impacts?
 - Thermal pollution decreases oxygen and increases pH, resulting in degraded water quality, algae blooms, dead zones, fish kills, and numerous other losses of plant and animal life.
- How much will the discharge of water over an additional 20 years contribute to erosion and other impacts on the shoreline and lake bottom?
- The EIS should include how NextEra will protect threatened and endangered species.
 - According to the U.S. Fish and Wildlife Service, as of 1/10/2018, there are five threatened and endangered species in Manitowoc County.
 - Two birds have diets that include marine worms, small crustaceans, insects, and other marine invertebrates which would be adversely affected by aquatic temperature changes. The endangered Piping Plover, found on Lake Michigan’s sandy beaches and on bare alluvial and dredge spoil islands, also has a critical habitat designation. The threatened Rufa Red Knot, a special concern species, may be found on the beaches during spring and fall migration.
 - The other species identified by USFWS include the endangered rusty patched bumble bee found in grasslands, the threatened Pitcher’s thistle which grows in stabilized dunes and blowout areas, and the threatened northern long-eared bat which hibernates in caves and mines. (The Manitowoc County Cherney Maribel Caves Park is 15 miles from Point Beach.)
 - What other species are at risk, including threatened and endangered aquatic species?
- How have the potential effects of climate change models and Lake Michigan water fluctuations been taken into consideration regarding future nuclear plant operations?