

SUNI Review Complete
Template=ADM-013
E-RIDS=ADM-03

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Comment (158)
Publication Date:2/1/2021
Citation: 86 FR 7747

As of: 3/9/21 9:15 AM
Received: March 03, 2021
Status: Pending_Post
Tracking No. klu-08jm-ap4r
Comments Due: March 03, 2021
Submission Type: Web

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

Document: NRC-2020-0277-DRAFT-0163

Comment on FR Doc # 2021-02001

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General Comment

See attached document.

Attachments

Point Beach EIS comments 3-3-21

SCOPING COMMENTS REGARDING THE PROPOSED LICENSE EXTENSION FOR THE POINT BEACH NUCLEAR POWER PLANT

Re: Docket ID: NRC-2020-0277 Point Beach Nuclear Plant, Units 1 & 2

MARCH 3, 2021

submitted by

David Kraft, Director, Nuclear Energy Information Service (NEIS), Chicago

Nuclear Energy Information Service (NEIS) is a safe-energy, nuclear watchdog organization based in Chicago, Illinois. NEIS has members in Wisconsin and throughout the Great Lakes Basin, whose interests would be affected by the proposal to extend the operating license at Point Beach Nuclear Power Plant (PBNPP).

Our experience over the past 11 years with the decommissioning of the Zion nuclear station, and the fairly recent 2013 license renewals of the Byron and Braidwood NPPs in Illinois provides us with enough first-hand experience to offer the following observations and comments regarding Environmental Impact Statement (EIS) Scoping Comments for Point Beach:

1.) ENVIRONMENTAL CONSIDERATIONS:

- The EIS should include in its deliberations the regular re-calculation of anticipated changes to Lake Michigan and regional weather, especially extreme weather event incidence relating to expected climate-change induced effects over the period of the proposed extension, and the impacts these might have on the safe operation of the PBNPP. Such an analysis should be conducted to include BOTH expected regional effects, AND localized, plant-specific impacts. Failure to examine these effects will produce an undervalued risk-assessment for the continued operation of the reactor site. NRC regulations should require these necessary periodic re-assessments; if such NRC regulations requiring these assessments do not exist, no license extensions should be granted until they do.
- NRC must require the re-calculation of PBNPP's capacity to withstand seismic events based on the NRC's most current re-calculations done, not the plant's design-basis calculations conducted when the plant was constructed. Such recalculations should appear in the EIS.
- NRC must require the re-calculation of PBNPP's ability to cope with severe flooding events based on the NRCs most current re-calculations done, not the plant's design-basis calculations conducted when the plant was constructed. Such recalculations should appear in the EIS.
- Since currently no operational disposal facility exists, and none will likely exist in the foreseeable future, the EIS needs to include an analysis and calculation of the environmental impacts of generating and storing onsite an additional 800 (~40 tons/year x 20 years for an 80-year operational cycle) and 1,600 tons (~40 tons/year x 40 years for a 100-year operational cycle, as currently under NRC consideration) of high-level radioactive waste (HLRW) in the form of spent-reactor fuel. These calculations should include: impacts of needing a larger ISFSI pad; more frequent fuel transfers and re-packaging as needed; increased probability for accidental releases during transfers and dry-cask functioning; and the above mentioned extreme weather and climate disruption effects on these calculations relating to the operation of the ISFSI.

2.) SOCIO-ECONOMIC CONSIDERATIONS:

- Socio-economic impacts must include and report a cost calculation of the short- and long-term effects of plant closure (for any reasons, including but not limited to: Unexpected major accident, resulting in immediate and presumably premature closure; NRC ordered shut down; Exelon's unilateral decision to close the plant on economic or other grounds, as it did at Zion, resulting in an immediate loss of about 55% of Zion's tax base; devaluation through sale, as occurred at the Clinton NPP in Illinois, resulting in enormous loss of tax base; eventual old-age, license expiration closure (the outcome most hoped for)) for all economic losses to the communities whose tax base, economies, job inventories and real estate are negatively impacted by such closures. Such an analysis should be done for BOTH premature closure of the PBNPP, AND the expected closure date as specified in the license.
- In our Sept. 2013 comments on the relicensing of the Byron and Braidwood reactors in Illinois, NEIS pointed out this glaring omission on the part of NRC's requirement and assessment in an EIS. We see that 8 years later, this glaring omission has not yet been corrected – resulting in a false and faulty calculation of total socio-economic impacts, which obviously would be much worse than what the NRC staff currently calculates. NRC regulations should require these necessary assessments; if such NRC regulations do not exist to require these assessments, no license extensions should be granted until they do.

3.) ECONOMIC CONSIDERATIONS:

- Since currently no operational disposal facility exists, and non- will likely exist in the foreseeable future, the EIS needs to include an analysis and calculation of the costs of generating and storing onsite an additional 800 (~40 tons/year x 20 years for an 80-year operational cycle) and 1,600 tons (~40 tons/year x 40 years for a 100-year operational cycle, as currently under NRC consideration) of high-level radioactive waste (HLRW) in the form of spent-reactor fuel. These calculations should include: impacts of needing a larger ISFSI pad; procurement of dry-transfer equipment; increased security; and maintenance costs.
- Calculation projections for increased O&M costs should be built into the EIS analysis. All aging facilities experience increase O&M over their lifetimes; nuclear reactors will require this for safety reasons.
- Given that an EIS by statute must include a "no-action" analysis, the EIS must provide both the calculations and the methodology used to obtain them for the comparative cost/MWh for the electricity generated by PBNPP compared to all likely alternatives, including but not limited to: renewable sources (wind, solar of all kinds); energy storage; energy efficiency and conservation. These calculations should be made spanning both the proposed 20 and 40 year plant license extension periods. They should also reflect stated state of Wisconsin plans for its energy future in dealing with climate crisis targets.
- The EIS needs to include an analysis of the fiscal viability of the plant owners over the duration of proposed license extension, to insure that the plant will have the financial resources to be operated safely. Such an analysis should include projected impact on customers for electric rate increases to insure the plant has adequate funding to operate safely.
- Given PBNPP's history of serious embrittlement of the reactor vessel, the EIS must provide both calculations for and the methodology used for the potential replacement of the reactor vessel, should that become necessary; and any interim costs relating to periodic inspection and necessary maintenance.
- An EIS should identify and provide cost calculations for all anticipated major O&M costs, both to the reactors, and to the adjacent site equipment.

4.) ENERGY CONSIDERATIONS:

- Given that an EIS by statute must also include a "no-action" analysis, the EIS must provide both the calculations and the methodology used to obtain them for the alleged need for the

electricity generated by PBNPP compared to all likely alternatives, including but not limited to: renewable sources (wind, solar of all kinds); energy storage; energy efficiency and conservation. These calculations should be made spanning both the proposed 20 and 40 year plant license extension periods.

5.) SAFETY:

- Given PBNPP's history of serious embrittlement of the reactor vessel, the EIS must provide both a finding and the methodology used to justify it for assessing the current and future projected condition of the reactor vessel. NRC regulations should require necessary periodic re-assessments; if such NRC regulations requiring these assessments do not exist, no license extensions should be granted until they do.
- The EIS should specify the type of reactor fuel the operator intends to use – high- vs. normal burn-up fuel, and in what quantities – and recalculate the safety impacts of the facility on air and water discharges, and operation of the ISFSI, should those not have been done already, in which case the EIS can include those analyses if they currently exist.
- PBNPP's total operational risk assessment should be re-calculated to include all of the environmental and safety impacts listed above.

6.) REGULATORY INADEQUACIES:

- In previous license extension and decommissioning proceedings with the NRC, NEIS has repeatedly pointed out that NRC insists on nuclear utilities operating using a "safety culture" that goes BEYOND the letter of the NRC requirements; yet, NRC itself fails to operate with those same standards, often relegating relicensing and decommissioning operations as mere perfunctory, "check-box", or –dare we suggest – "rubber stamp" exercises. The EIS should indicate whether NRC will employ such a "safety culture" that goes beyond their mere regulatory requirements in assessing the relicensing of PBNPP.
- It became apparent in preparing comments for this docket that 1.) certain links provided by NRC did not function and 2.) a request for a short extension of the filing time as a result of this NRC failure was rejected. This is not the first NRC failure to perform its public participation function in a competent and professional manner. Such failings have become quite common; and attempts to point out problems and offer suggestions to improve the public participation process go without NRC response. Such performance calls into question the validity we are to ascribe to this EIS scoping process.
- In its 10-year participation in the Zion NPP decommissioning, NEIS has repeatedly identified to the NRC – even in direct conversation with two former NRC Chairs -- numerous flaws and absences of needed regulation in the areas of decommissioning and relicensing. Yet, to date we have seen no corrective action implemented on these matters of concern raised. Until we see such corrective action undertaken and implemented by the NRC, there is no rational basis for the public to conclude that this relicensing proceeding will be conducted in a manner protective of the public and the environment. We are making this position known to members of the Illinois Delegation to Congress, for their consideration in future budget allocations.

We thank you for consideration of these views, and are available to answer any questions you may have pertaining to them.