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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

I would like to share two links to creations of Fairewinds Energy Education. The first is a video, entitled "Nuclear Crack Down?", about reactor pressure vessel neutron embrittlement, and consequent pressurized thermal shock risk of through-wall fracture, core meltdown, and potential catastrophic radioactivity release. Here is the link: <<https://www.fairewinds.org/nuclear-energy-education/nuclear-crack>> The second is an essay, "Downstream," about the risks of a radioactive catastrophe on the Great Lakes shoreline, in light of the Fukushima Daiichi nuclear catastrophe in Japan, about to hit its ten year mark on 3/11/21, with no end in sight. Here is that link: <<https://www.fairewinds.org/demystify/downstream?rq=downstream>>. Arnie Gundersen, Fairewinds Energy Education's chief engineer, served as an expert witness for the environmental coalition comprised of Beyond Nuclear-Don't Waste Michigan-Michigan Safe Energy Future-Nuclear Energy Information Service, when it challenged a reactor pressure vessel embrittlement license amendment at the Palisades atomic reactor, in Covert, MI, across Lake Michigan from Point Beach. Terry Lodge served as legal counsel. Michael Keegan served as chief researcher and technical consultant. Despite our coalition's best efforts at Palisades in 2014-2015, NRC rubber-stamped Palisades' requested license amendment, another weakening of embrittlement safety standards, on top of so many that had come before.

Many of those same groups had challenged Palisades' requested 20-year license extension (for a total of 60 years of operations), from 2005-2007. Again, NRC rejected our challenges, and rubber-stamped 60 years of embrittled operations at Palisades, PTS risks be damned.

Now we are shocked that Point Beach Unit 2, a RPV about as embrittled if not more so, than Palisades, has applied to NRC for not 60 years of operations (which have already been permitted), but 80.

As I've mentioned in previous comments, AP investigative reporter Jeff Donn cited PTS safety regulatory retreat as his top example of a complicit NRC, captured by the industry it is supposed to regulate, in his

post-Fukushima four-part series, "Aging Nukes."

In 2014-2015, as we battled Entergy, NRC staff, and the NRC Commissioners, over PTS risks at Palisades, I compiled an annotated bibliography timeline, which documents repeated regulatory weakening of PTS safety standards, over the course of many long decades. Here is the link to it, posted online: <<http://www.beyondnuclear.org/safety/2014/10/30/beyond-nuclear-warns-nrc-against-weakening-rpv-embrittlement.html>>.

At least Palisades has announced its closure, for good, by 5/31/22. Point Beach Unit 2, however, has applied for yet another 20-year license extension, meaning 30 more years of operations. This is tempting fate.

Given this very troubling history of NRC regulatory retreat on PTS safety standards -- in fact yet another weakening is underway or has already been approved, recently/presently -- and given the high stakes for the Great Lakes and all who call them home, I urge you in the strongest possible terms to reject Point Beach's application for 80 years of high-risk, embrittled operations.