

# PUBLIC SUBMISSION

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

ADD: Phyllis Clark, Bill Rogers,  
Kevin Folk, Stacey Imboden,  
Mary Neely  
Comment (180)  
Publication Date: 2/1/2021  
Citation: 86 FR 7747

**As of:** 3/9/21 3:37 PM  
**Received:** March 03, 2021  
**Status:** Pending\_Post  
**Tracking No.** klu-bqjv-h9hb  
**Comments Due:** March 03, 2021  
**Submission Type:** Web

**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-0185

Comment on FR Doc # 2021-02001

---

## Submitter Information

**Email:** kevin@beyondnuclear.org

**Organization:** Beyond Nuclear and Don't Waste Michigan

---

## General Comment

(Beyond Nuclear, comment #11, Part 2)

For more information on "routine" radioactivity releases from nuclear power plants, please see the linked Beyond Nuclear pamphlet at:  
<[http://static1.1.sqspcdn.com/static/f/356082/26605366/1444852853757/BN\\_RoutineRadioactiveReleases\\_Oct2015.pdf?token=zwsUExAyfOttAa88dOgh7qJ3NkE%3D](http://static1.1.sqspcdn.com/static/f/356082/26605366/1444852853757/BN_RoutineRadioactiveReleases_Oct2015.pdf?token=zwsUExAyfOttAa88dOgh7qJ3NkE%3D)>.

Of course, as Beyond Nuclear has commented, the risk of a catastrophic radioactivity release at Point Beach is already significantly high, and increases with time. 80 years of operations at Point Beach, with its worst embrittled RPV (Reactor Pressure Vessel) in the U.S., represents sailing ever deeper into uncharted PTS (Pressurized Thermal Shock) risk territory. A catastrophic radioactivity release at Point Beach would have LARGE impacts on Indigenous Nations' interests on and near the site, and very likely far from the site, depending on wind direction, water flow, and food chain distribution networks. EXTRA LARGE, in fact, to borrow a phrase from Susan Schuurman with the Nuclear Issues Study Group in Albuquerque, NM, Beyond Nuclear's colleague in the fight against Consolidated Interim Storage Facilities for irradiated nuclear fuel in s.e. NM, also on lands significant to many Indigenous Nations, as well as the Latinx communities who live there now.

The basic form letter goes on, "Although construction of the existing PBN facility itself may have impacted any archaeological resources that may have been located within its footprint, much of the surrounding area remains largely undisturbed."

That description of past destruction due to lack of caring, concern, law, and regulation is very heartbreaking, and enraging. It can never be repeated again in the future, now that the United States supposedly recognizes that cultural genocide is not acceptable (a dubious proposition, given how Indigenous cultural resources and properties are still abused and even destroyed in this country -- take the Dakota Access Pipeline bulldozing Lakota sacred sites in the Dakotas in 2016, as but one example). But again, "routine" hazardous radiation releases, and the potential for catastrophic, large-scale hazardous radiation releases, also represent an EXTRA LARGE impact. This has gone on for 50 years already, and would go on for another 30 years, if NRC rubber-stamps Point Beach's license extension application.

The basic form letter goes on:

"A cultural resources survey of the property was not required prior to the construction of PBN, but five recorded surveys were conducted at various stages of expansion and licensing between 1993 through 2018. These surveys have covered approximately 972 acres of the of the 1,260-acre PBN property. There are no National Register of Historic Places (NRHP)-eligible cultural resources confirmed within the 1,260-acre PBN property. The June 2004 survey identified findings, which included 15 isolates and one prehistoric archaeological site. PBN has committed to avoiding previously identified sites within the 1,260-acre property."

It is sad and angering that "A cultural resources survey of the property was not required prior to the construction of PBN". This means that Indigenous Nations' cultural resources and properties, including burial sites and sacred sites, could well have been damaged or destroyed simply through the physical construction of the facility, let alone radioactive contamination since.

And what about Point Beach Nuclear committing to avoiding damage or destruction to unidentified sites on the property, in addition to identified sites?

Such damage or destruction can never be allowed to happen again, including on "much of the surrounding area [that] remains largely undisturbed." Of course, "routine" hazardous radioactivity release contamination is itself a significant disturbance, which Point Beach Nuclear entirely downplays and ignores in its basic form letter.

Again, re: the basic form letter's claim that:

"A cultural resources survey of the property was not required prior to the construction of PBN, but five recorded surveys were conducted at various stages of expansion and licensing between 1993 through 2018. These surveys have covered approximately 972 acres of the of the 1,260-acre PBN property. There are no National Register of Historic Places (NRHP)-eligible cultural resources confirmed within the 1,260-acre PBN property. The June 2004 survey identified findings, which included 15 isolates and one prehistoric archaeological site. PBN has committed to avoiding previously identified sites within the 1,260-acre property."

It is hard to understand how Point Beach Nuclear can state that "There are no National Register of Historic Places (NRHP)-eligible cultural resources confirmed within the 1,260-acre PBN property."

(To be continued)