

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

ADD: Phyllis Clark, Bill
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Comment (182)
Publication
Date:2/1/2021
Citation: 86 FR 7747

As of: 3/9/21 3:50 PM
Received: March 03, 2021
Status: Pending_Post
Tracking No. klu-d1rj-y66e
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-0187

Comment on FR Doc # 2021-02001

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General Comment

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

Dear Friends,

As a member of Physicians for Social Responsibility – Wisconsin, I care deeply about the public health and environmental well being of Wisconsinites, Lake Michigan, and all the great lakes.

Operating two nuclear reactors on the shore of Lake Michigan, creating more highly radioactive and toxic wastes at the edge of one of the world's greatest fresh water resources, is cause for extreme caution.

I have two topics for inclusion in the scoping of the EIS for Point Beach License Extension. Please address each of the sub points listed in the following. I look forward to your reply to these comments.

Neutron Embrittlement of Reactor Pressure Vessels
Lake Levels and Stronger Bigger Storms

Neutron Embrittlement of Reactor Pressure Vessels

Point 1:

Earlier NRC reporting identified Unit 2 at Point Beach as one of the two most embrittled reactors in the United States. Currently NRC opinion seems to discount the risks that the additional embrittlement over time incurs. A rule change may alter the official listed status of a facility, but it cannot alter the laws of physics and metallurgy.

Before any license extension may be granted for Point Beach, the NRC must conduct a transparent, thorough and publically reported examination of the sample “coupons” within the Point Beach reactors. These bits of metal were placed in the reactor vessels so that at a later time, like now, they could be examined to assess the degree of neutron bombardment degradation and embrittlement of the reactor pressure vessel metal.

There is plenty of time in which to accomplish this important empirical task, in that current licenses expire in 2030 and 2033. With what is at stake, the Great Lakes and the health of so many who live around them, it is unconscionable to judge reactor integrity from a computer modeled calculation rather than examining empirical evidence and openly discussing what is found and what that means regarding additional decades of reactor operation.

No license extension should be granted unless and until empirical evidence is used to determine that continued reactor operation is safe based on the analysis of neutron embrittlement of the reactor pressure vessel metal.

Point 2:

Issuance of a license extension for Point Beach should be contingent upon a thorough and transparent hard look at an autopsy of the soon to be closed Palisades Nuclear Power Plant in Michigan, and solid judgment that the evidence discovered adequately addresses any and all safety of operation concerns at Point Beach.

Here again there is available empirical evidence to examine. To estimate or calculate or postulate evidence is malfeasance in contrast to readily available empirical evidence.

Point 3:

A comprehensive listing and analysis of all NRC safety notices for Point Beach needs to be conducted before license extension.

There are past periods wherein Point Beach was the worst or next to worst operated site in the United States, accounting for a disproportionate percentage of NRC Red Findings.

Do any of these past events portend degradation of equipment condition and function, especially when considering an additional 20 years of operation?

Lake Levels

In 2013 Lake Michigan was at a historic low water level. Seven years later in 2020, Lake Michigan was at a historic high water level. At the same time, within the past few weeks we have seen a storm system that covered almost the entire continental United States and froze the state of Texas.

The greater volatility and extremes of weather events is consistent with basic climate science and the weather phenomenon we observe and experience. How will these future extreme events impact the site

integrity and function, ensuring that public health and environmental safety are paramount?

Point 1)

There must be a full and hard look at the physical characteristics of the Point Beach site relative to providing uninterrupted access of personnel and materials and electricity during times of high water levels, significant rainfall, and strong and persistent winds.

Point 2)

Climate impact projections must include examination of the synergistic effects of multiple weather components. High lake levels, heavy rains and prolonged high winds are three such factors. Higher lake levels make storm damage worse. Point Beach is right at the water's edge, and not far above current lake levels.

Point 3)

Evaluate all mechanical components on site for potential flooding, especially durability of off site power supply, to withstand such extreme weather conditions.

Point 4)

Examine and report on effects of higher lake levels on ground water levels, movements and contamination in the area of the Point Beach facility.