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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

(Beyond Nuclear, public comment #13)

Re: alternatives analyses, Point Beach Nuclear's consideration of a small modular nuclear reactor as a replacement, instead of 80 years of operations of the current two age-degraded atomic reactors, is an economic absurdity. Consider the following scholars' examination of the fatally flawed economics of small modular nuclear reactors:

(1.) The Economic Failure of Nuclear Power and the Development of a Low Carbon Electricity Future: Why Small Modular Reactors are Part of the Problem, by Dr. Mark Cooper of Vermont Law School, May 2014. Posted online at: <<https://www.nirs.org/wp-content/uploads/reactorwatch/newreactors/cooper-smrsaretheproblemnotthesolution.pdf>>.

(2.) Numerous works by Dr. Arjun Makhijani of Institute for Energy and Environmental Research:

Light Water Designs of Small Modular Reactors: Facts and Analysis, September 2013. Posted online at: <<https://ieer.org/resource/energy-issues/light-water-designs-of-small-modular-reactors-facts-and-analysis/>>.

When Small Is Not Beautiful, Is It At Least Cheap?, April 2013. Posted online at: <<https://ieer.org/news/small-modular-reactors/>>.

Is There a Role for Small Modular Reactors? December 2012. Posted online at: <<https://ieer.org/energy-systems/is-there-a-role-for-small-modular-reactors/>>.

Small Modular Reactors, Fact Sheet -- No Solutions for the Cost, Safety, and Waste Problems of Nuclear

Power. Posted online at: <<https://ieer.org/resource/energy-issues/small-modular-reactors-solution/>>.

(3.) Dr. Gordon Edwards, Canadian Nuclear Safety Commission, et al., Small Modular Nuclear Reactors: A Case of Wishful Thinking at Best, December 2019. Posted online at: <http://www.ccnr.org/SMNR_article_2019.pdf>.

This is but the tip of the iceberg of scholarship critical of the economics, and other aspects, of small modular nuclear reactors.

As we have commented previously in this proceeding, real alternatives to yet another 20 more years at the already dangerously age-degraded Point Beach nuclear power plant should be analyzed. These would include renewables like wind and/or solar, complemented with storage technologies like batteries and/or compressed air energy storage. (Point Beach's insistence to pair solar with natural gas back up as an alternatives analysis is misleading. Solar can be backed up with battery storage and/or compressed air energy and/or other green storage technologies, instead of polluting natural gas combustion.)

Another alternative is maximized energy efficiency. These alternatives are cleaner, safer, just as or more reliable, more secure, and more affordable than a radioactive catastrophe at an age-degraded Point Beach nuclear power plant past 60 years of operations, and the same re: a small modular nuclear reactor design, at increased risk of radioactive catastrophe due to its untested design. The break in phase, like the break down phase, is a period of increased reactor risks. Chernobyl and Three Mile Island Unit 2 were break in phase disasters at brand new reactors, for example.

Sincerely,

Kevin Kamps

Beyond Nuclear, Radioactive Waste Specialist; Don't Waste Michigan, Board of Directors Member, representing the Lake Michigan Chapter; Citizens for Alternatives to Chemical Contamination, Advisory Board Member

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Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.