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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-2020-0277-0194
NextEra Energy Point Beach, LLC; Point Beach Nuclear Plant, Units 1 and 2

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General Comment

NRC Public Participation Deficiencies: For the general public concerned with the potential license extension for the two reactors at PBNP, participation is difficult and fraught with obstacles for adequate public participation:
- Common sense and seemingly logical thinking and expression by the general public is most often met with such concerns being relegated to some other part of the regulatory body's apparatus, at some other time, so that instead of having a meaningful discussion of the important issues at hand, like reactor vessel embrittlement and additional high level waste being created on the shore of Lake Michigan, public concerns are channeled into a 'regulatory' process gap that obscures the public voice. Our concerns regarding embrittlement dangers, climate change, truly renewable alternative energy options, and the economic impact related to Power Purchase Agreements somehow are seemingly irrelevant, as their purview is someplace else than this licensing proceeding.
- On the micro level, the technological level for public participation is sadly lacking. Instead of the ease and convenience of the many Zoom like communication programs available today, the agency charged with being fully up to date in an important regulatory capacity asks the general public to participate in an antiquated two step communications process, which requires both an internet computer connection and an active telephone line for the hours long proceedings.

It is worth noting that the section on climate change needs to be completely rewritten so that it is based on the most current data from the Intergovernmental Panel on

Climate Change - the IPCC 2021 report.
- Specifically, the report is the “AR6 Climate Change 2021: The Physical Science Basis,” published August 2021. Since the current PBNP licenses extend until 2030 and 2033, there is plenty of time for the NRC to get up to speed with the latest in climate science, produced by the United Nations IPCC, a significant collaboration of hundreds of the world’s leading climate scientists. This is a conservative, rigorously science based organization, and the 2021 report is eye-opening.
- The most recent IPPC Report referenced in the climate change section of NRC’s Draft Generic EIS is from 2007. It is unacceptable for the NRC to present fourteen-year-old data as a sound scientific basis for projecting what climate conditions will be at PBNP 32 years into the future – that is a 46 year knowledge gap. Data from this year, 2021, is available on the internet; using it makes it only a 32 year knowledge gap about actual climatic conditions at the site of the two atomic reactors operating on the shore of Lake Michigan, a precious Wisconsin asset.
- The immediate and imminent impacts of climate change on operations at PBNP are new categories of consideration for an EIS, and much of the science and observed changes are recent phenomenon, which underscores why the most current data must be used and why this topic must receive a fresh and new appraisal of conditions. Fourteen year old data is not acceptable.
- The number of extreme weather events has increased dramatically in the last decade. The August 2020 derecho event in Iowa damaged the Duane Arnold Nuclear Reactor facilities, which narrowly escaped a catastrophic nuclear accident. Point Beach is similarly vulnerable to derechos, tornados and extreme weather events.
- Lake level fluctuations and larger storm surges contribute to an increase in erosion along the shores of Lake Michigan, threatening reactor operations. Meanwhile, over 1,000 metric tons of nuclear waste are stored onsite at PBNP, on the shoreline of Lake Michigan. Lake Michigan recorded a record low lake level in 2013, and only seven years later, recorded a record high lake level in 2020.