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**Attachments:** Point Beach EIS Formal Comments.pdf

Please see the attached comments on the Point Beach renewal by the Sierra Club Wisconsin and Michigan chapters.

Thank you,  
Elizabeth

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# SIERRA CLUB

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January 3, 2022

Thank you for accepting our comments on the draft Environmental Impact Statement (DEIS) for the renewal of the Point Beach nuclear plant (Point Beach). Comments below reflect concerns of both Wisconsin and Michigan, where there is potential for great harm from the continued use of the Point Beach nuclear station .

Both states are directly vulnerable to offsite radioactive releases both planned and unplanned. Wind and weather generally flow from west to east over a scant 50 miles to the Michigan shore. Lake Michigan and it's ecology is shared by both states so it is appropriate for the Sierra Club-Michigan Chapter to express concerns along with the Sierra Club-John Muir Chapter in Wisconsin.

**These comments are submitted on behalf of the Sierra Club-John Muir Chapter with 20,000 members and the Sierra Club-Michigan Chapter with 17,000 members.**

The DEIS failed to properly consider some important considerations.

First, the DEIS did not properly consider the impacts of a potential accident. Contamination from radioactivity of Lake Michigan's freshwater could be devastating for those who get their drinking water from Lake Michigan and those who recreate on or near the lake. This includes those who use Point Beach State Park to swim, fish, boat, and more. The impacts could be large and the DEIS didn't properly study the environmental, health, and economic impacts of a potential spill.

Climate change is already wreaking havoc on our communities and we know that we need to work hard to avoid the worst impacts of climate change, but that it's too late to stop all damage. However, the DEIS uses outdated data when looking at the impacts of climate change, including updated data about lakeshore levels.

More consideration to the changing climate should be addressed. It is now impossible to extrapolate from past events. The EIS should consider more emergency generator backups in case of extended offsite electrical outages due to more violent weather or possible terrorist or cyber attacks.

The DEIS didn't fully consider all of the impacts of extending the Point Beach license, including the short-term impacts. Point Beach nuclear station does not have cooling towers which would reduce overall water intake and incorporate a 95% temperature reduction in the water returned to Lake Michigan. Presently, Point Beach nuclear plant uses approximately one billion gallons of lake water per day through the plant and releases it at a much higher temperature directly back into the lake. The data related to thermal pollution and the inability for the screens to properly stop fish and smaller life like phytoplankton from being killed. Over time, heating Lake Michigan to unnatural levels and killing of fish and smaller life could lead to ecological changes that need to be more properly considered and reviewed in the DEIS.

The EIS needs to be updated to include these concerns and up-to-date information before any permitting process moves forward.

Safety of these aging reactors is a primary concern. On Aug. 11, 2021, Unit One had an emergency trip or scram. On Aug. 16, 2021, the alert sirens were turned off for some time. This invites a disaster. The sirens should be tested and turned back on immediately. Potassium Iodide pills should be distributed to every residence, school and business within a 10 mile radius to protect the thyroid from Iodine-131 in the event of a release. In the event of an accident, Michigan officials should also be immediately alerted.

With the imminent closing of Palisades nuclear station, also on Lake Michigan, Point Beach Unit 2 will inherit the unenviable distinction of having the most embrittled reactor in the nation, according to several nuclear experts. A through wall fracture from embrittlement could release massive amounts of radiation. NRC approval of another 20 year extension should not occur until a thorough evaluation for embrittlement of both reactors occurs. The EIS needs to include this analysis and this evaluation could occur during the process of refueling.

Refueling is expected to occur every 18 months or sooner if necessary. Since there are two reactors, would this mean refueling for both at the same time or one every 9 months. A German study in 2011 revealed huge releases of radioactive gasses including Noble gasses H-3 tritium, Carbon-14 and Iodine-131 during the refueling process. According to Dr. Alfred Korblein, Noble gas emissions were up to 500 times normal operation. "Especially at risk are unborn children. When reactors are open and releasing gasses, pregnant women can incorporate much higher concentrations of radionuclides than at other times." Radioactive isotopes inhaled by the mother can cross the blood and placenta barrier. "This provides a plausible explanation for the findings of the KiKK Study published in 2007-2008 that under 5 year old children living near nuclear power stations were at increased risk of cancer and especially leukemia than children living further away." These emission spikes should not be folded into a yearly average which gives a false impression that everything is within regulations. This information should be included in the EIS.

Next Era, owner of Point Beach, operates the station as a merchant plant and is allowed to sell to Wisconsin Electric (WE Energies) at a 53% premium so ratepayers are charged a higher rate for electricity. WE also supplies Michigan's Upper Peninsula and is a contributing factor to those residents being subject to the 2nd highest electric rates in the country (next to Hawaii). It is cold in the U.P. and rates at this level should be considered an Environmental Justice issue and listed in the EIS, since the poverty rate in the U.P. is 15.7%.

The EIS fails to consider updated information that could replace the power generated by the Point Beach facility with extensive efficiencies on the part of users, wind and solar installations and numerous other strategies such as reduced demand side and community micro-grids that are quicker to install and far less expensive.

If Point Beach receives another 20-year extension and is allowed the same 60-year time frame for decommissioning as Wisconsin's Kewaunee nuclear plant, closed in 2013, that would extend the parking of deadly radioactive wastes or final cleanup until 2110 for Unit 1 and 2113 for Unit 2.

Someone born in 2022 would be 91 years old and still paying for cleanup, a preventable situation unfair to this and future generations.

**Thank you for taking our comments into consideration.**