

From: AMY SCHULZ <aschulz@wisc.edu>
Sent: Tuesday, December 28, 2021 9:15 PM
To: PointBeach-SLRSEIS Resource
Subject: [External_Sender] Comments for Docket ID: NRC-2020-0277-0194

I have concerns with several sections of the EIS.

The section on "Climate Change" needs rewriting because it is based on data from the Draft EIS from 2007. The "ARG Climate Change 2021: The Physical Science Basis" published by the United Nations Intergovernmental Panel on Climate Change contains the most current data.

The 2007 data will be even more outdated in 2033 and again in 2053 at the end of the proposed licensure. This use of outdated information in a rapidly changing environment is untenable. Our planet is experiencing more extreme weather events. In Iowa on 8/10/20, the Duane Arnold Nuclear Reactor was struck by derecho winds which not only made many roads impassable but it also contributed to a near catastrophic meltdown. The high winds cut off the external power supply, it blew down the cooling towers and it took the plant operators 14 hours to stabilize and cool the reactor. This example reflects the vulnerability of nuclear reactors to tornadoes and derechos. The recent historic lake level fluctuations (2013 was a record low and 2020 was a record high) and larger storm surges are contributing to erosion along the shores of Lake Michigan. There are more than 1000 metric tons of nuclear waste stored at Point Beach Nuclear Plant on the shoreline of Lake Michigan and it is threatened by this continued erosion.

The section on "Alternative Actions" is insufficient because alternatives to a non-renewal do not include the option of wind power (on-shore and off-shore) or energy conservation. A source from 9/30/08 documents 300,00 megawatts-electric wind power potential for Michigan from the Great Lakes. Wisconsin would have significant potential wind power from both Lakes Superior and Michigan. There is also onshore wind potential that is being harnessed as reflected by the wind farms around the state. Regarding the utilization of energy conservation, communities are building energy efficient homes and commercial buildings. Retrofitting older buildings to meet efficiency standards will also decrease the demand for electricity. Utilizing solar panels for water and space heating has become economical for the public. Financial incentives for the temperature settings on our thermostats can motivate households and businesses to conserve on heating and air conditioning. Improving the infrastructure for public transportation and electric cars charged by solar power are also ways to unplug from the nuclear energy sources. We are requesting that one Alternative Action be included that has 100% renewables and efficiency recommendations. The proposal to utilize Small Modular Reactors (SMRs) is a delusive alternative because they are not currently commercially available. The safety record of SMRS is also a concern.

The term "foreseeable future" was used by NextEra and the NRC to be until 2053. The radioactive waste that is being stored onsite must be safeguarded for THOUSANDS of years and the 2053-time frame does not take this into consideration. The eventual decommissioning of these reactors has also been excluded from this review.

Regarding the “safety assessment”, the EIS does not adequately assess the risk to human health. The EIS for PBNP (Point Beach Nuclear Plant) uses the NRC’s “SOARCA” (State of the Art Reactor Consequences Analysis) which falsely concludes that the risks to public health as a result of severe accident are “very small”. It only assesses the risk of cancer deaths and not the incidence of cancer incidents related to radiation exposure. Excess deaths among evacuees related to lack of access to prompt health care for chronic illness is not addressed nor is the mental health of those impacted by an accident. There is also no documentation of illness or death related to leaks of radiation via accidental or scheduled releases that occur from stored fuel or with exchanges of fuel rods.

Finally, the NRC process for the public participation for commenting on the relicensing proposal has been laden with obstacles. While concerns about safety, economic justice, and renewable alternatives should be incorporated into the feedback by the public, this input is frequently dismissed as irrelevant to the proscribed structure of the information that the NRC is willing to consider. Thus the most embrittled reactor in the country is poised to be relicensed for another 20 years, 40 years beyond its originally designed lifetime of 40 years. The structure for participation in these public meetings requires a two-step process of using one’s phone and computer for these long meetings, thus excluding those without internet access. It also could use a more user friendly format of Zoom for participants. The overall experience appears rigged against the public and an injustice to those that are most concerned about the health and safety of the citizens of Wisconsin.

Federal Register Notice: 86FR62220
Comment Number: 234

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Subject: [External_Sender] Comments for Docket ID: NRC-2020-0277-0194
Sent Date: 12/28/2021 9:14:33 PM
Received Date: 12/28/2021 9:14:44 PM
From: AMY SCHULZ

Created By: aschulz@wisc.edu

Recipients:
"PointBeach-SLRSEIS Resource" <PointBeach-SLRSEIS.Resource@nrc.gov>
Tracking Status: None

Post Office: DM5PR06MB2874.namprd06.prod.outlook.com

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