Baltimore Gas & Electric Statement at the
United States Nuclear Regulatory Commission
Public Comment Meetings on the
Draft Supplemental Environmental Impact Statement for the
Calvert Cliffs Nuclear Power Plant

Good afternoon/evening. My name is Barth W. Doroshuk and I am the Director of the Life Cycle Management Project at the Calvert Cliffs Nuclear Power Plant (Calvert Cliffs). I am representing the Baltimore Gas & Electric Company (BGE) at these United States Nuclear Regulatory Commission (USNRC) meetings. The purpose of this meeting is for the NRC to offer the public another opportunity to participate in the re-licensing process of Calvert Cliffs. As we have heard, this particular opportunity in the process is to provide NRC with any comments on this document, the plant specific supplement to the Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants. On behalf of BGE and the Calvert Cliffs family of approximately two thousand men and women who work at the plant, let me express my thanks for the opportunity to make a statement regarding the environmental impact of license renewal for Calvert Cliffs.

Today I would like to discuss two subjects with you, and then I will yield my remaining time to the other speaker for BGE.

First, I would like to discuss the openness of the overall re-licensing process and in particular that of Calvert Cliffs. The second subject I will discuss is the findings of the USNRC regarding the environmental effects of re-licensing. Finally, I have arranged for Calvert Cliffs to make a few statements on behalf of itself relative to the surrounding environment and its role in Maryland, and as a part of the BGE family.

There has been some interest in the public process of the re-licensing of nuclear power plants. Let me briefly describe how open the environmental review has been, how many opportunities there have been for public input.

I want to do this by looking at the openness of the overall regulatory process and how open our minds have been about listening to everyone. Then I want to look at how open our "door" has been to everyone and tell about some of those who have taken advantage of it. And finally I will let you know about our ongoing open invitation to address your ideas, questions and suggestions.

Before our application, the NRC conducted a five-year public proceeding to prepare the Generic Environmental Impact Statement on license renewal. This proceeding included public workshops, several opportunities to submit written comments on the draft generic environmental impact statement, and a formal rulemaking.

Then, in our proceeding, the NRC staff has conducted scoping meetings and prepared a draft supplement looking at the site-specific impacts of renewing Calvert Cliffs licenses. The NRC staff has looked at all the issues that were generically resolved in the GEIS and determined that they remain valid for Calvert Cliffs. In addition, the staff has looked at the issues that were not resolved in the GEIS and found that any impacts associated with these issues are small. The public now has not only the opportunity to express its views today, but also the opportunity to submit written comments on the draft SEIS.

In July of last year, many of us met in this same location to express our opinions and submit our comments about the scope of the environmental assessment that would occur as part of the review of BGE's license renewal application.

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This process has been much more than writing letters. The NRC listened to our ideas and suggestions. They have even enlisted the assistance of a national laboratory to help them review all of the information. As a result of comments made last July, the scope of the review was expanded.

Looking closer to home at this issue, since 1993, BGE has held in excess of 60 public meetings with the NRC (no fewer than 14 public meeting in the last 12 months) on the topic of license renewal, and has submitted on the public record literally hundreds of documents detailing our efforts.

Apart from the license renewal process, Calvert Cliffs has a visitor's center open seven days a week. The Calvert Cliffs family hosts, on average, 3000 people per month who come to visit us. These visits allow for learning by our visitors and listening by BGE.

In addition, there is an open invitation for visitors to request a tour of the actual plant – inside the fence, inside the buildings. Every year BGE conducts somewhere between 100 to 150 tours of Calvert Cliffs by our visitors without hesitation.

If anyone has a safety concern or any information anytime that indicates the environment is being disturbed there is virtually an unlimited number of avenues to get that information to BGE, the NRC, the State of Maryland or whoever the right people are. You can even dial a toll-free number if need be, or you can e-mail us, or you can simply stop by. I think the process has offered all an enormous amount of opportunity to participate.

Those of you who were here last July heard me discuss the conclusions of BGE's own environmental review and some of the facts surrounding our decision to submit our applications, some of the facts supporting our conclusion that it makes good sense to continue to operate the plant.

After all the scientific studies we have conducted and after taking into account all of the considerations and alternative actions, BGE continues to believe that it makes good sense to maintain the equilibrium established between the plant, the air, the Bay and the land.

I would draw everyone's attention to Table 9-1, on page 9-6. I believe that table says it all. It summarizes and compares the environmental impacts of Calvert Cliffs' license renewal and the alternatives. It reports that the environmental impact of license renewal is recognized as small in all impact categories. *Small* is defined as "environmental effects are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource." In simple terms, this means there are no environmental impacts from license renewal on Calvert Cliffs.

Indeed, the land, the water, and the air are clean around here.

Each of the alternatives evaluated within the SEIS has been determined to have more significant impact than license renewal in one or more impact category. The document evaluated the no-action alternative, and coal-fired and gas-fired power replacements. Let me briefly discuss some of the alternatives that did not make the final assessment and the reasons why.

Many of us in this room live here in Calvert County. This county has 213 square miles of land space. Calvert Cliffs, a 1700-megawatt power plant which generates on average approximately 13

billion kilowatt-hours of electricity, occupies only 280 acres at the Calvert Cliffs site. A 2000-acre green-space buffer, the remainder of the Calvert Cliffs site, surrounds the plant. To replace Calvert Cliffs' electrical generation with wind-driven turbines or windmills, we would need to cover 255 thousand acres, or 400 square miles, almost twice the land area of Calvert County. If we look at solar and consider the average solar incidence in Maryland, solar power would require two to three times the land area of the wind power option — over 1000 square miles. Hydropower replacement would require a 2600 square mile area of reservoir-covered land to generate the power of Calvert Cliffs. In the eastern United States, we simply don't have the land area to consider the wind, solar, or hydro alternatives.

The environment around us is a complex one, and we believe change should be carefully considered. After all the scientific studies and considerations that go into alternative actions, BGE feels that it makes good sense to maintain the equilibrium established between the plant, the air, the Bay and the land.

I believe the consistent conclusion from all of the environmental reviews, assessments, and evaluations is compelling. The continued operation of Calvert Cliffs beyond the original licensed periods will provide the people of Maryland with a safe and reliable source of energy. The continued operation of Calvert Cliffs will continue to be a contributor to the environment by striking that careful balance between clean air and a stable energy supply. The continued operation of Calvert Cliffs will continue to provide economic stability to Maryland and BGE.

We have spent the last two and one-half hours talking about something that is not in the room. So in this part of my remarks I would like to show you a short video of Calvert Cliffs and allow the plant to tell of its role in our way of life here in Maryland. We realize, and want to say up front, that no film ever escapes a critic! So let me say up front that Speilbergs we are not, nor do we pretend to be! I believe this short clip shows the essence of the great relationship Calvert Cliffs has with our community. I believe I will let Calvert Cliffs speak for itself.

We at BGE and Calvert Cliffs take pride in our position as a good neighbor in this community. We believe that this is widely recognized. The value of Calvert Cliffs is plain and simple. The value of the environment is also obvious to us all.

The video encourages people to speak out. To all that have offered rational input to this process, I thank you for taking part. Speaking for all the employees and management at Calvert Cliffs, I would like to graciously thank everyone who demonstrated their support of our initiative.

BGE believes it just makes sense to continue to preserve the safe, reliable and environmentally sound technology that Calvert Cliffs offers us.

Thank you.