



Altamaha RIVERKEEPER

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U.S Nuclear Regulatory Commission
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To Whom It May Concern,

The Altamaha Riverkeeper (ARK) organization files these comments as part of the Environmental Impact Statement process for the License Renewal Application for Edwin I. Hatch Nuclear Reactors I and II by the Southern Nuclear Operating Company and others.

ARK is a non-profit organization working to restore and protect the habitat, water quality, and flow of the mighty Altamaha from its headwaters in North Georgia to its terminus at the Atlantic Coast. The health and safety of the Altamaha River and its surrounding habitat is of great concern to our members. ARK members live, work, and pursue recreational activities in and along the river.

At its April 20, 2000 meeting the Board of Directors adopted the following statement. "The Altamaha Riverkeeper is concerned about the ongoing and future operations of Plant Hatch. We oppose the effort to re-license the plant and are concerned about the impact of on site dry cask storage of spent nuclear fuel."

Discussion

Plant Hatch is located directly on the banks of the Altamaha River. Its proximity to the river and its potential for continued routine release of radiation and other man-made pollutants into the river and its drainage area create anxiety and concern, even among those who profess to support the use of nuclear energy in some circumstances.

In this case, we have an aging nuclear reactor with a history of "incidents" and "accidents" that have routinely increased levels of public exposure to radiation. While "fixing things up as you go" has merit in

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many circumstances, in a nuclear plant this practice leaves the public with serious questions and concerns about the safety and stability of the facility in question. Some of the greatest concerns are raised by workers or former workers who have participated in "finding solutions", but whose current and future jobs depend upon their silence.

While those whose current economic well-being results from the continued operation of Plant Hatch strongly support this attempt to extend its license and create an on-site storage site for spent nuclear fuel, thousands of others whose livelihoods and way of life would be threatened or destroyed by a serious accident do not.

We fully understand why those whose incomes are derived from Plant Hatch support its continued operation and sympathize with their circumstance. However, we fear that the ongoing lack of health studies on plant workers put these very people at greatest risk of harm, while they are being routinely admonished that their exposure is "routine and safe."

And certainly, we believe that no one currently or ever working at Plant Hatch takes actions that they believe will endanger their community or the overall health and safety of the region. But we know from review of NRC reports that human and mechanical errors do occur during the routine operation of Plant Hatch and often the combination of mechanical failure with human error creates circumstances that have not been predicted or modeled for solution.

We also know that in spite of several decades and millions of dollars of investment, we have no viable solution for the long-term safe storage of spent nuclear fuel. Any thoughtful observer must ponder the sanity of spending millions of dollars to re-license a nuclear plant whose capacity for on-site storage of nuclear waste has been exhausted. The creation of additional temporary on-site storage of nuclear waste in dry casks designed for transportation to some unknown place begins to sound like science fiction. Especially to people whose lives are based on tides and whose livelihoods are derived from understanding and respecting the laws of God and nature.

It appears that we lack a true understanding of the impact of the operation of Plant Hatch on workers, the surrounding area and especially on downstream fish, mollusks, arthropods, and other critters living in the water and feeding on the sediments and nutrients in the water column.

Simply calling downstream effects a generic problem and assuming that downstream effects of some model facility in another region equal the effects experienced by a specific hydrologic unit and its inhabitants is pure folly. While we do not presume to offer an exhaustive review of the literature on this topic, it appears that the few studies that have been done off site do show increased levels of radiation downstream in river sediments. We are aware of a

recent award winning high school science fair project which shows levels of Cobalt 60 present in mussel shells from below Plant Hatch are higher than levels from mussels above Plant Hatch.

Furthermore, failure to assess the impact of these materials on the biological function of the organisms in question further suggests that Southern Nuclear and the NRC are inviting an entire region to continue participating in a dangerous long-term experiment simply because perceived economics dictate higher profits for the operating company and continued economic opportunity for local workers.

Recreational and commercial fishermen are reporting increased numbers of fish and crabs with sores and malformations. They also report decreased numbers of many species and often little to no evidence of adequate reproduction. This antidotal information further begs the need to conduct real, non-biased, scientific biological assessments of the species in question as well as the upstream factors that may be contributing to the current decline in many species.

As the coastal region continues to grow and dramatically increase in population, the impacts of normal operations and certainly of routine or catastrophic accidents at Plant Hatch on the resident population will only increase. Thousands of jobs in fisheries and tourism are also at risk and that risk must be measured and taken into account when evaluating alternatives and cost of continued operations at Hatch.

The additional risks imposed on the region by the on-site storage of high level nuclear wastes are unbelievable to the average citizen. Given our recent history of hurricane evacuation and storm events including random deadly tornados, it seems careless and reckless to increase the risks of operating a nuclear plant by increasing the vulnerability of highly radioactive spent fuel rods. While no one chooses to imagine or speculate on potential natural disasters, one must only look to film clippings from our neighbors in North Carolina to witness the unbelievable impact of floodwaters on man-made structures and development.

A site visit to Plant Hatch and its on-site nuclear fuel storage facility confirms its proximity to the Altamaha River. To suggest that a major hurricane and related tornadoes and flood events would have no impact on this site is to defy forces of nature over which well-meaning humans have absolutely no control.

We offer these comments to the NRC as citizens who know and care about the Altamaha River and its surrounding regions. While our resources do not allow extensive review of documents or independent research to evaluate our concerns, we expect that the Nuclear Regulatory Commission will consider our comments and dedicate resources to objectively address these concerns. We

reiterate that we oppose the renewal of Plant Hatch's operating license and the continued development of additional on-site storage of nuclear waste.

We thank you for your consideration and ask that the record remain open for additional comments as our resources allow us to evaluate these proposals and determine their impacts on our members and region.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Sheppard". The signature is written in a cursive style with a large, sweeping flourish at the end.

Deborah Sheppard
Executive Director
P.O. Box 2642
Darien, Georgia 31305