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Mr. James H. Wilson  
Mail Stop O 11 F 1  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20277-2904

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Dear Mr. Wilson,

I would like to comment on the subject of the July 17, 2001, Public Meeting to Discuss the Draft Supplemental Environmental Impact Statement for Turkey Point Units 3 and 4.

I have been a resident of Miami-Dade County for more than 25 years; I hold a Ph.D. in history and have been director of sponsored research and then Vice President for Research at Florida International University, the state university in Miami-Dade County, for nineteen and a half years. In addition, since 1994 I have been a member of the Council of Sponsoring Institutions of the Oak Ridge Associated Universities (ORAU), manager of the Oak Ridge Institute for Science and Engineering (ORISE).

I was impressed by the professional behavior of the Commission staff who conducted the meeting and made technical presentations and also by the friendliness of the staff members who greeted the public at the door of the meeting room. All who wished to speak publicly were treated with consideration. All were invited to speak privately with Commission representatives if they so chose. I did so and found Commission representatives willing to discuss matters in some detail.

The renewal process was very clearly outlined for the audience. I was concerned to learn from the discussion of the license renewal process that the focus of this particular meeting would be narrowly focused on matters that pertained only to the Turkey Point plants 3 and 4 and would not address general environmental issues that involved them.

Nothing in the handout, "Preliminary Results of Environmental Review of Turkey Point Units 3 and 4," or the discussion indicated that the looming shortage of technical and scientific personnel in the nuclear industry had been addressed in the general environmental impact statement. At this meeting, numerous FP&L employees, most over 45 or 50 years of age, spoke about the enthusiasm of the workers at the plants and their determination to work with management to operate the plants safely. Having seen at first hand the operation of FP&L's St. Lucie plants and the intense dedication of company management and employees to safety and ongoing training, I was not surprised by the statements to that effect made by company officials and workers. I do believe, however, that the looming shortage of technical and scientific personnel in the nuclear industry will affect FP&L and must be addressed as part of its relicensing review. Adequate numbers of properly trained workers are essential to the operation

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of the industry as a whole and individual plants as well, including Turkey Point 3 and 4. Across the country, the number of students studying for work in the nuclear industry has been dropping and university reactors have been fewer and fewer. What steps has FP&L taken and what steps will it take to ensure adequate numbers of workers under such industry-wide conditions?

I might add here that the very last speaker from the public attending the meeting, a Mr. Ruben Rothschild (sp?), an FP&L employee, 28 year veteran of the US Navy and nuclear power industry, and Scoutmaster, raised a warning flag that might give the Commission grounds for concern. The speaker said that he had worked at more than one nuclear facility and contrasted the fine management of the Turkey Point reactors by FP&L with poor management at one or more other sites. I believe that the Commission should, for the public good, follow up on that public testimony, informal though it may have been, about the alleged poor management at those other plants.

I hope that the Commission will carefully consider the statement made by one of the speakers, a mathematician employed by Miami-Dade Community College, who questioned the validity of the statistical methodology used in the General Environmental Impact Statement.

Over and over, speakers made the point that nuclear power plants made for cheaper energy and freedom from dependence on foreign oil. I am not sure that such arguments are germane to the general or specific environmental impact issues but, if they are, then I have to enquire whether the nuclear industry is subject to a monopolistic source of fuel at home. I understand that the American nuclear industry could turn to European countries including Russia for fuel. World markets for petroleum, however, are more broadly based and thus presumably less risky for energy consumers.

I left the meeting with a strong concern that the division of the review process into General and Specific Environmental reviews was efficient but left something to be desired from a systems perspective, as I mentioned afterwards to Mr. Brant of the Commission. The lack of political will to solve the problem of long-term storage of spent fuel, for example, makes the assumption that on-site storage of spent fuel at Turkey Point will be temporary seem increasingly weak. And, as I mentioned above, the work force issue is another general issue with inescapable implications for Turkey Point 3 and 4. I also came away puzzling over the following statement in the handout in the section, "Radiological Impacts on Human Health," "National Cancer Institute examined cancer mortality rates around 52 nuclear plants, including Turkey Point, and found not causally linked to deaths from leukemia or other cancers in nearby populations." I was under the impression that, in the absence of a specific catastrophic instance, causal determinations were exceptionally hard if not impossible to make using public health data. Thus the inability to demonstrate causality should not necessarily be grounds for complacency.

Sincerely,



Thomas A. Breslin