

April 19, 2002

Mr. Michael P. Gallagher
Director - Licensing
Exelon Corporation
200 Exelon Way
Kennett Square, Pennsylvania 19348

SUBJECT: ISSUANCE OF ENVIRONMENTAL SCOPING SUMMARY REPORT
ASSOCIATED WITH THE STAFF'S REVIEW OF THE APPLICATION BY
EXELON GENERATION COMPANY FOR RENEWAL OF THE OPERATING
LICENSES FOR PEACH BOTTOM ATOMIC POWER STATION,
UNITS 2 AND 3

Dear Mr. Gallagher:

From September 24 through November 26, 2001, the Nuclear Regulatory Commission (NRC) conducted a scoping process to determine the scope of the NRC staff's environmental review of the application for renewal of the operating licenses for the Peach Bottom Atomic Power Station, Units 2 and 3, submitted by Exelon Generation Company, LLC by letter dated July 2, 2001. As part of the scoping process, the NRC staff held two public environmental scoping meetings in York County, Pennsylvania on November 7, 2001, to solicit public input regarding the scope of the review. The scoping process is the first step in the development of a plant-specific supplement to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS)," for the Peach Bottom Atomic Power Station.

The NRC staff has prepared the enclosed Environmental Scoping Summary Report identifying comments received at the November 7, 2001, license renewal environmental scoping meetings, by letter, by electronic mail and by fax. In accordance with 10 CFR 51.29(b), you are being provided a copy of the enclosed report. The transcripts of the meetings can be found as an attachment to the meeting summary issued on January 18, 2002. The meeting summary is available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document management system (ADAMS) under accession number ML020180346. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm.html> (the Public Electronic Reading Room) (Note that the URL is case-sensitive).

M. Gallagher

2

The next step in the environmental review process is the issuance of a Draft Supplement to the GEIS scheduled for July 2002. Notice of the availability of the draft supplement to the GEIS and the procedures for providing comments will be published in an upcoming *Federal Register* notice. If there are any questions concerning this matter, please have your representative contact me at (301) 415-1444.

Sincerely,

Original Signed By: LLWheeler

Louis L. Wheeler, Senior Project Manager

Environmental Section

License Renewal and Environmental Impacts Program

Division of Regulatory Improvement Programs

Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

Enclosure: As stated

cc w/encl: See next page

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PEACH BOTTOM LICENSE RENEWAL ENVIRONMENTAL SCOPING SUMMARY REPORT

Introduction

On July 2, 2001, the Nuclear Regulatory Commission (NRC) received an application from Exelon Generation Company, LLC (Exelon) dated July 2001, for renewal of the operating licenses of Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The PBAPS units are located in York County, Pennsylvania. As part of the application, Exelon submitted an Environmental Report (ER) prepared in accordance with the requirements of 10 CFR Part 51. 10 CFR Part 51 contains the NRC requirements for implementing the National Environmental Policy Act (NEPA) of 1969 and the implementing regulations promulgated by the Council on Environmental Quality (CEQ). Section 51.53 outlines requirements for preparation and submittal of environmental reports to the NRC.

Section 51.53(c)(3) was based upon the findings documented in NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants," (GEIS). The GEIS, in which the staff identified and evaluated the environmental impacts associated with license renewal, was first issued as a draft for public comment. The staff received input from Federal and State agencies, public organizations, and private citizens before developing the final document. As a result of the assessments in the GEIS, a number of impacts were determined to be small and to be generic to all nuclear power plants. These were designated as Category 1 impacts. An applicant for license renewal may adopt the conclusions contained in the GEIS for Category 1 impacts, absent new and significant information that may cause the conclusions to fall outside those of the GEIS. Category 2 impacts are those impacts that have been determined to be plant-specific and are required to be evaluated in the applicant's ER.

The Commission determined that the NRC does not have a role in energy planning decision-making for existing plants, which should be left to State regulators and utility officials. Therefore, an applicant for license renewal need not provide an analysis of the need for power, or the economic costs and economic benefits of the proposed action. Additionally, the Commission determined that the ER need not discuss any aspect of storage of spent fuel for the facility that is within the scope of the generic determination in 10 CFR 51.23(a) and in accordance with 10 CFR 51.23(b). This determination was based on the Nuclear Waste Policy Act of 1982 and the Commission's Waste Confidence Rule, 10 CFR 51.23.

On September 24, 2001, the NRC published a Notice of Intent in the *Federal Register* (66 FR 48892), to notify the public of the staff's intent to prepare a plant-specific supplement to the GEIS to support the renewal application for the PBAPS operating licenses. The plant-specific supplement to the GEIS will be prepared in accordance with NEPA, CEQ guidelines, and 10 CFR Part 51. As outlined by NEPA, the NRC initiated the scoping process with the issuance of the *Federal Register* notice. The NRC invited the applicant; Federal, State, and local government agencies; local organizations; and individuals to participate in the scoping process by providing oral comments at the scheduled public meetings and/or submitting written suggestions and comments no later than November 26, 2001. The scoping process included two public scoping meetings, which were held at the Peach Bottom Inn in York County, Pennsylvania, on November 7, 2001. The NRC issued press releases, and distributed flyers locally. Approximately 70 members of the public attended the meetings. Both sessions began with the NRC staff

ENCLOSURE

providing a brief overview of the license renewal and the NEPA processes. Following the NRC's prepared statements, the meetings were opened for public comments. Twenty-one (21) attendees provided either oral comments or written statements that were recorded and transcribed by a certified court reporter. The transcripts of the meetings can be found as an attachment to the meeting summary, which was issued on January 18, 2002. The meeting summary is available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS) under accession number ML020180346. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm.html> (the Public Electronic Reading Room) (Note that the URL is case-sensitive).

The scoping process provides an opportunity for public participation to identify issues to be addressed in the plant-specific supplement to the GEIS and highlight public concerns and issues. The Notice of Intent identified the following objectives of the scoping process:

- Define the proposed action
- Determine the scope of the supplement to the GEIS and identify significant issues to be analyzed in depth
- Identify and eliminate peripheral issues
- Identify any Environmental Assessments and other Environmental Impact Statements being prepared that are related to the supplement to the GEIS
- Identify other environmental review and consultation requirements
- Indicate the schedule for preparation of the supplement to the GEIS
- Identify any cooperating agencies
- Describe how the supplement to the GEIS will be prepared

At the conclusion of the scoping period, the NRC staff and its contractor reviewed the transcripts and all written material received, and identified individual comments. Fourteen letters, emails, or documents containing comments were received during the scoping period. All comments and suggestions received orally during the scoping meetings or in writing were considered. Each comment from each commenter was given a unique alpha-numeric identifier (comment ID) which allowed it to be traced back to the transcript, letter, or email by which the comments were submitted. Several commenters submitted comments through multiple sources (e.g., afternoon and evening scoping meetings).

Table 1 identifies the individuals providing comments and the commenter ID associated with each person's comments. The commenter ID is preceded by PBS (abbreviation for Peach Bottom Scoping). For oral comments, the individuals are listed in the order in which they spoke at the public meeting. Accession numbers indicate the location of the written comments in the NRC document management system (ADAMS).

Comments were consolidated and categorized according to the topics within the proposed supplement to the GEIS, or according to the general topic if outside the scope of the GEIS. Comments were grouped to capture their common essential issues. Once comments were grouped according to subject area, the staff and contractor determined the appropriate action to be taken. The staff made a determination on each comment that it was one of the following:

- A comment that was actually a question and introduced no new information.
- A comment that either supported or opposed license renewal in general (or specifically, PBAPS), or that made a general statement about the license renewal process. It may have made a general statement regarding Category 1 and/or Category 2 issues. In addition, it provided no new information and did not pertain to 10 CFR Part 54.
- A comment about a Category 1 issue that provided new information requiring evaluation during the review, or provided no new information.
- A comment about a Category 2 issue that provided information requiring evaluation during the review, or provided no such information.
- A comment regarding alternatives to the proposed action.
- A comment that raised an environmental issue not addressed in the GEIS.
- A comment outside the scope of license renewal (not related to 10 CFR Parts 51 or 54), which included comments regarding the need for power.
- A comment on safety issues pertaining to 10 CFR Part 54.

The preparation of the plant-specific supplement to the GEIS (herein after referred to as the SEIS) will take into account all the relevant issues raised during the scoping process. The SEIS will address Category 1 and 2 issues, and any new information identified as a result of the public scoping process. The SEIS will rely on conclusions supported by information in the GEIS for Category 1 issues, and will include the analysis of Category 2 issues and any new and significant information. The draft SEIS will be made available for public comment. The comment period will offer the next opportunity for the applicant; interested Federal, State, and local government agencies; local organizations; and members of the public to provide input to the NRC's environmental review process. The comments received on the draft SEIS will be considered in the preparation of the final SEIS. The final SEIS, along with the staff's Safety Evaluation Report (SER), will provide a substantial portion of the basis for the NRC's decision on the PBAPS license renewal application.

TABLE 1 - Individuals Providing Comments During Scoping Comment Period

Commenter ID	Commenter	Affiliation (If Stated)	Comment Source (and ADAMS Accession Number where applicable)^(a)
PBS-A	Christopher Reilly	York County	Afternoon Scoping Meeting
PBS-B	Kay Carman	York County	Afternoon Scoping Meeting
PBS-C	Jay Doering	Exelon	Afternoon Scoping Meeting
PBS-D	Fred Polaski	Exelon	Afternoon Scoping Meeting
PBS-E	Salvatore Ferranti		Afternoon Scoping Meeting
PBS-F	Bill Doward	Sheetmetal Workers Union Local 19	Afternoon Scoping Meeting
PBS-G	John Tucker		Afternoon Scoping Meeting
PBS-H	Terry Peck	Plumbers and Pipefitters Union Local 520	Afternoon Scoping Meeting
PBS-I	William Faraly, Jr.	Sheetmetal Workers Union Local 19	Afternoon Scoping Meeting
PBS-J	Sam McConnell		Evening Scoping Meeting
PBS-K	Jay Doering	Exelon	Evening Scoping Meeting
PBS-L	Fred Polaski	Exelon	Evening Scoping Meeting
PBS-M	Mike Ewall		Evening Scoping Meeting
PBS-N	Tracy Confer		Evening Scoping Meeting
PBS-O	Kip Adams		Evening Scoping Meeting
PBS-P	Ernie Guyll		Evening Scoping Meeting
PBS-Q	Richard King		Evening Scoping Meeting
PBS-R	Laura Jacobson		Evening Scoping Meeting
PBS-S	Jane Lee		Evening Scoping Meeting
PBS-T	Mary Osborn		Evening Scoping Meeting
PBS-U	William Coble		Evening Scoping Meeting
PBS-V	Jeff Griffith		Evening Scoping Meeting
PBS-W	Amy Donohue		Evening Scoping Meeting
PBS-X	George Crocker	North American Water Office	Email - Letter ML020110480)
PBS-Y	Dr. Lewis Cuthbert	The Alliance for a Clean Environment	Faxed Letter (ML020020383)
PBS-Z	Amy Donohue		Letter (ML013460258)
PBS-AA	Mike Ewall	Energy Justice Network	Flyer (ML020170483)
PBS-AB	Thomas H. Gehr		Email – Letter (ML020230264)
PBS-AC	Joseph Mangano	Radiation and Public Health Project	Email (ML020230268)
PBS-AD	David P. Harry		Email – Letter (ML020310096)
PBS-AE	Hugh Jackson	Public Citizen, Policy Analyst	Email – Letter (ML020310088)
PBS-AF	Hugh Jackson	Public Citizen, Policy Analyst	Email – Letter (ML020310088)
PBS-AG	Richard L. McLean	Maryland Department of Natural Resources	Letter (ML020230262)
PBS-AH	Christopher Reilly	York County	Letter (ML020170484)
PBS-AI	Ken Zieber		Email (ML020230260)
PBS-AJ	Thomas E. Donley	York County Chamber of Commerce	Letter (ML013650052)
PBS-AK	Daniel R. Griffith	Delaware State Historic Preservation Officer	Email (ML013650064)

(a) The afternoon transcripts can be found under accession number ML020170145 and the evening transcripts can be found under accession number ML020170208

**Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3
Public Scoping Meeting
Comments and Responses**

The following pages summarize the comments and suggestions received as part of the scoping process, and discuss their disposition. Parenthetical numbers after each comment refer to the commenter's ID and the comment number. Comments can be tracked to the commenter and the source document through the commenter's ID listed in Table 1. Comments are grouped by category. The categories are as follows:

1. General Comments in Support of Nuclear Power
2. General Comments in Opposition to Nuclear Power
3. General Comments in Opposition to License Renewal and its Processes
4. Comments in Support of License Renewal at Peach Bottom Atomic Power Station, Units 2 and 3 (PBAPS)
5. Comments in Opposition to License Renewal at PBAPS
6. Comments Concerning Category 1 Human Health Issues
7. Comments Concerning Category 1 Socioeconomic Issues
8. Comments Concerning Category 2 Socioeconomic Issues
9. Comments Concerning Category 2 Aquatic Ecology Issues
10. Comments Concerning Alternatives to License Renewal
11. Comments Concerning Category 1 Uranium Fuel Cycle and Waste Management Issues
12. Comments Concerning Postulated Accident Issues
13. Comments Concerning Issues Outside the Environmental Scope of License Renewal (i.e., Operational Safety, Safeguards and Security, Aging Management, Need for Power, Cost of Power, and Other Issues).

Comments

1. General Comments in Support of Nuclear Power

Comment: In the aftermath of the events that occurred on September 11 and the subsequent war on terrorism now being waged in the Middle East, it is critical that we focus on domestic energy production and limit America's reliance on foreign oil. The continued operation of quality nuclear facilities such as Peach Bottom will ensure that we have the energy necessary to power our homes and businesses, even during times of national and international uncertainty. (PBS-AH-2)

Response: The comment is noted. The comment is supportive of the nuclear power industry, and is general in nature. The comment is outside the prescribed scope of license renewal, provides no new information, and will not be evaluated further.

2. General Comments in Opposition to Nuclear Power

Comment: By the field that a lot of you people here have chosen to work in that are present tonight, you have made a choice that the risks and the benefits far exceed what we would call something that could be detrimental. (PBS-Q-1)

Comment: Power companies have shown a pattern of siting themselves near boundaries of state lines, municipal governments and county lines. Are there weaknesses being exploited here due to political subdivisions? I don't know, but I am asking the question. (PBS-Q-2)

Comment: Having been here during Three Mile Island, I find neither the utility nor the Nuclear Regulatory Commission to be forthcoming. Frankly, you people scare me. And also, I don't trust you. (PBS-Q-5)

Comment: It was interesting to note that prior to the accident at TMI -- and by the way, I live on a farm -- we were having problems with our farms, with our animals: goats, cats, cows. (PBS-S-3)

Comment: I am telling you this because of the people, the ordinary people who are going to be the victims of this, drinking the water, inhaling the atmosphere. (PBS-S-4)

Comment: We're killing everybody slowly, discreetly. I don't consider myself a radical, by any means, but I find this unacceptable. (PBS-S-6)

Comment: Surely any one of you sitting here who promote this and think it's okay, it's not okay. It's immoral. (PBS-S-8)

Comment: Nuclear power is one of the most horrendous, lethal, stupidest ways to boil water man could have ever conceived. (PBS-T-6)

Comment: The other thing is, where I live for 23 years, 22-1/2 years exactly, I have had mutations in my yard of all kinds. I have found them within 15 miles of the plant at TMI. (PBS-T-10)

Comment: And Dr. Gunkel of Rutgers, who had been retired, specifically stated that the specimens I showed him showed a full range of radiation effects. And like I said, every year since the accident at Three Mile Island I have had mutations in my yard, down my street, across the river where Jane lives. And specifically, the worst effects I have found have been around the 15-mile radius. (PBS-T-11)

Comment: Another thing is the health studies. You all may believe that nothing really happened at TMI. But if any of you knew how to read a health study you would see that all the studies ever done show that there were increases in cancers and other health effects. (PBS-T-12)

Comment: Another thing that really angers me and I don't understand how you all can get away with this for so long, in 1979 a little sign was posted outside of TMI stating that the background radiation for that area was 70 to 80 millirems per hour. And you all know that you are telling us that now it is all of a sudden up to 300 millirems for per year. I said the wrong thing. It's 70 to 80 per year. So I want to know what caused this increase. I mean, it was something apparently that happened in the air. Is that why the strontium-90 is being found at high levels? (PBS-T-14)

Comment: I mean, you folks at the NRC with your actions are terrorizing us because you don't care for sure, for real, about the humans and the animals and the plants. (PBS-T-15)

Comment: Basically, you need to shut these places down and decommission them and clean them up. (PBS-T-16)

Comment: And you guys really ought to get your act together and get real and start caring about people because there is nothing else on this planet that matters as people. (PBS-T-17)

Comment: In sum, I believe that it was a good idea to do nuclear power in the past but it is no longer a good idea. (PBS-U-6)

Comment: I can't see how anybody can say it is economical or safe or smart to generate how much radioactive material is going to stay toxic to everything around it for longer than the human race has been on this earth. (PBS-W-2)

Comment: And I know that radioactivity creates cancer. (PBS-W-4)

Comment: I mean, you know, my mom taught me to clean up your messes. If you can't clean up your mess, then you stop creating it. We need to stop creating the mess. Doesn't make sense. It's not smart. It's very stupid. (PBS-W-7)

Comment: It is time to close nuclear plants when permits end, not renew their threat to human health for another 20 years, especially those like Peach Bottom that have caused such enormous human health and safety risks already. (PBS-Y-6)

Comment: What does it say about our government which in the 1950's exposed citizens downwind of Hanford to intentional releases of radiation to see what would happen? What about the lack of honest communication by our government in the aftermath of Three Mile Island? (PBS-Z-4)

Comment: When considering the risks, you should see the reality behind the numbers. Hear the stories of people whose lives and families and health have been affected by radiation. (PBS-Z-30)

Comment: You make value judgements about the level of health effects "acceptable" to the public despite the secrecy, deception and public relations to keep the public from knowing the truth. (PBS-Z-31)

Comment: Government fails to collect information and data on health effects of radiation exposure, fails to adequately collect information on public health, fails to keep or study health records, fails to keep cumulative records of radiation exposures for members of the general public from nuclear industry activities. (PBS-Z-32)

Response: The comments are noted. The comments are generally in opposition to nuclear power and do not provide any new information. These comments are not within the scope of 10 CFR Part 51 for the environmental review associated with the application for license renewal at PBAPS. Therefore, these comments will not be considered further in the SEIS.

3. General Comments in Opposition to License Renewal and its Processes

Comment: To engage in re-licensing procedures twelve and thirteen years prior to license expiration betrays an agenda designed to serve corporate shareholder and nuclear industry interests, at the expense of public safety and fair, competitive electricity markets. If now were the appropriate time to consider re-licensing these reactors, the operating licenses would have been issued for an original 30 years, not 40. (PBS-X-2)

Comment: First of all, let me be clear, I know that it doesn't matter what I say, or what anyone says, during this process to re-license Peach Bottom Atomic Power Plant. The regulations say you have to get public input, so you let us have our say. But in the end, the decision will be made despite our input. (PBS-Z-1)

Comment: The decision will also be made despite anything in the Environmental Impact Statement (EIS). (PBS-Z-2)

Comment: So, again, I know it doesn't really matter what I, just a citizen, have to say. (PBS-Z-3)

Comment: Because radioactivity can damage human health, an accurate assessment of risk to the public is warranted. However, current regulatory policies do not include any such risk assessment. The NRC has approved the first five applications for reactor license extension, with no consideration of disease rates, including cancer, in persons living closest to reactors. (PBS-AC-4)

Response: The comments are noted. These comments oppose license renewal and its processes in general, but do not provide new information. The Commission has established a process, by rule, for the environmental and safety reviews to be conducted to review a license renewal application. While the comments listed above criticize the process, they do not raise any issues within the scope of this license renewal review. Therefore, the general comments in opposition to license renewal and its processes will not be evaluated further.

4. Comments in Support of License Renewal at Peach Bottom Atomic Power Station, Units 2 and 3

Comment: Peach Bottom has an exemplary record of safety, is a vital component of the local economy and deeply cares about our community. (PBS-A-4)

Comment: So re-licensing Peach Bottom is a sound decision. It's a sound business decision. It's a sound environmental decision. And it's also a sound community decision. (PBS-C-11)

Comment: And it's the right thing to do from our viewpoint, both for the company and the community and the country to continue to operate this plant for another 20 years. (PBS-D-7)

Comment: The Peach Bottom Power Station has a quality record for providing safe, clean and efficient electricity for the future and security of our nation. (PBS-H-1)

Comment: The environmental impact is controlled. (PBS-I-10)

Comment: And it may be of surprise to you that I actually support the extension of the license for Peach Bottom. (PBS-J-3)

Comment: I made the choice to live here with full understanding that Peach Bottom Atomic Power Station was to be my neighbor. And to date, nothing has happened or they have done nothing to change the opinion that they are a good neighbor. (PBS-J-4)

Comment: On behalf of the York County Board of Commissioners, I respectfully urge the Nuclear Regulatory Commission to approve a 20 year license extension to Peach Bottom Atomic Power Station. (PBS-AH-1)

Comment: Peach Bottom has an exemplary safety record, is a vital component of the local economy and cares about our community. By extending Peach Bottom Atomic Power Station's operating license, the NRC will help ensure at least two more decades of growth, opportunity and prosperity in York County. (PBS-AH-4)

Comment: The York County Chamber of Commerce strongly supports the application of Exelon Corporation for a 20-year extension of the operating license for the Peach Bottom Nuclear Power Plant. (PBS-AJ-1)

Comment: I hope that you will be able to expeditiously approve Exelon's operating license extension. (PBS-AJ-5)

Response: The comments are noted. The comments are supportive of license renewal at PBAPS, and are general in nature. The comments provide no new information; therefore, the comments will not be evaluated further.

5. Comments in Opposition to License Renewal at Peach Bottom Atomic Power Station, Units 2 and 3

Comment: Given the risks involved to the residents of this area, renewal should not be granted and both Peach Bottom and Three Mile Island should be closed with due haste. Decommission these plants now. (PBS-Q-8)

Comment: The present attempt by Exelon to re-license the Peach Bottom reactors, and NRC processing Exelon's application, may serve interests intent upon preserving privilege and profit from nuclear operations. But on multiple grounds, there is no rational justification for re-licensing Peach Bottom now. (PBS-X-1)

Comment: There is no rational basis for re-licensing the Peach bottom reactors, and without such a basis, the re-licensing process should be terminated. Unfortunately, we realize that preserving the nuclear option until catastrophe strikes is more important to the nuclear industry and its regulators than is proceeding rationally. So you will proceed with this misguided attempt to preserve private privilege and profit at public expense. But know that you are being watched, and be advised that irresponsible behavior usually produces consequences. (PBS-X-6)

Comment: It seems both irresponsible and irrational to extend the life of Peach Bottom from 2013 to 2033. ACE urges you to protect public health and safety for the enormous population, which can be adversely affected by what happens at Peach Bottom, including our over-exposed population already facing a health crisis in Pottstown. PLEASE DENY THIS PERMIT! (PBS-Y-10)

Comment: An EIS for Peach Bottom should consider the effects not just on humans, but the entire ecosystem, since we are all connected. Radiation mutates the cells of all living organisms -- animals, plants, insects, birds, even microorganisms in the soil, air, water. Mutated cells in any of these can create a chain reaction throughout the entire ecosystem. Humans are at the top of the food chain. (PBS-Z-11)

Response: The comments are noted. The comments oppose license renewal at PBAPS, and do not provide new information. These comments are not within scope of 10 CFR Part 51 for the environmental review associated with the application for license renewal at PBAPS. Therefore, these comments will not be evaluated further in the SEIS.

6. Comments Concerning Category 1 Human Health Issues

As stated in 10 CFR Part 51, Table B-1, Category 1 human health issues include:

- Radiation exposure to the public during refurbishment
- Occupational radiation exposure during refurbishment
- Microbiological organisms (occupational health)
- Noise
- Radiation exposures to public (license renewal term)
- Occupational radiation exposures (license renewal term)

Comment: We are also finding higher incidents of thyroid and breast cancers in nuclear reactor communities, including in the tri-county area around here. (PBS-M-9)

Comment: I would submit that an environmental impact statement ought to include human population as part of the scope. (PBS-N-1)

Comment: I would also suggest that since Peach Bottom is so close to Limerick, Three Mile Island, and not terribly far from Salem, that the impacts of Peach Bottom should be considered in conjunction with the cumulative impacts of all those three reactors combined. I would even extend that as far as a 100-mile radius for my own comfort. (PBS-N-2)

Comment: Some of the numbers that they have compiled indicate that thyroid cancer increased considerably after Units 2 and 3 started operation. The number they came up with is that it increased 49 percent. (PBS-N-3)

Comment: In short, I would like to submit that the scope should include non-cancer health effects in the human population, that it should include cumulative impacts from other reactors over a 100-mile radius. (PBS-N-4)

Comment: My father died of cancer about 16 years ago and he lived a very healthy lifestyle, I believe. He had smoked but he stopped about 23 years before he died. The only unhealthy thing he might have done is, he spent a lot of time outside. (PBS-P-2)

Comment: And one thing I would like as far as the environmental study is to know the number of those radioactive releases and how much radiation was released. (PBS-P-4)

Comment: I would also like as part of the environmental study data on the cancer deaths, birth defects and stillbirths in a 10-mile radius of the Peach Bottom Power plant and how that compares with the national average. (PBS-P-5)

Comment: I would like to know the type of radioactive isotopes at the plant and the half-life of those isotopes. (PBS-P-7)

Comment: Something even more troubling is the release of tritium and tritium is a nuclide generated out of the process of nuclear power plants. Tritium is part water and it cannot be

filtered and therefore, it goes into the river. Down river anybody who is drinking that water is drinking tritiated water. (PBS-S-1)

Comment: The steam that is released into the atmosphere is also tritiated so that when it drifts downwind from where you live, you are inhaling tritium. (PBS-S-2)

Comment: We have learned that cancer deaths near the Peach Bottom plant rose in Lancaster and York Counties after Units 2 and 3 began operations.

- Increases were noted in radiation-sensitive cancers, including leukemia, breast, thyroid, bone and joint, Hodgkin's disease, and multiple myeloma.
- The number of women diagnosed with breast cancer in Chester, Lancaster, and York Counties nearly doubled between 1985 and 1998.
- Thyroid cancer in the three counties jumped from 26 to 110 between 1985 and 1998. The current rate is 28% above the rate for the U.S. Thyroid cancer is considered one of the more radiation-sensitive cancers. (PBS-Y-1)

Comment: Peach Bottom is obviously an enormous health risk to over a million residents in that region. In fact, Pottstown, an area already hard-hit by high rates of diseases like cancer, is located about 45-50 miles northeast (downwind from Peach Bottom).

- Pottstown residents ingest airborne particles (either breathed or from the local municipal water) routinely escaping from Peach Bottom.
- The Pottstown area gets much of its milk from dairies located in Lancaster and York Counties, near Peach Bottom. Residents, both near Peach Bottom and elsewhere like Pottstown, ingest Peach Bottom fallout in milk. (PBS-Y-3)

Comment: The EIS on Peach Bottom should require a brutally honest look at radiation and its effects on everything around it -- air, water, soil, humans, and other animals, plants, insects -- over the millions of years for which it remains hazardous. (PBS-Z-8)

Comment: Plutonium is biologically and chemically attracted to bone. It clumps on the surface of the bone, delivering a concentrated dose of radiation to surrounding cells. Radioactive strontium lodges in bone and remains there for a lifetime, constantly irradiating the surrounding cells. (PBS-Z-9)

Comment: It's pretty common knowledge that radiation causes cancer and death. What isn't common knowledge is the other effects it can have on the human population, which we may already be experiencing without seeing the connection to radiation. R. M. Sievert, famous radiologist, told an international meeting in 1950, "There is no known tolerance for radiation." Death by slow poison is as unacceptable as death by catastrophic accident. There is no safe exposure to ionizing radiation. (PBS-Z-10)

Comment: Fission products may be called 'background radiation' when they do not emanate from the installation under consideration, or when they have been in the environment for a year

or more. Thus, when two nuclear power plants on the same land are licensed separately (such as Peach Bottom), the pollution from one is considered 'background radiation' while contamination from the other is being considered. Plus, last year's pollution from the reactor becomes 'background' after persisting in the environment longer than a year. An individual's yearly radiation exposure estimate attributable to nuclear activities is an assessment of a fresh fission dose from a particular source -- not a realistic measure of total dose from all sources, whether external -- left over from last year's pollution or already incorporated into body tissue from previous ingested or inhaled radionuclides, continuing to give small doses of radiation all the time. It is also misleading to report pollution in terms of a percentage increase in 'background radiation' levels. Little or nothing is said about the steady increase in background radiation due to human activities. Hence, a percentage of 'background radiation' added may stay constant, masking the total accumulation. (PBS-Z-12)

Comment: Government regulations allow radioactive water to be released into the environment, containing "permissible" levels of contamination. "Permissible" does not mean safe. (PBS-Z-17)

Comment: Do operations of reactors, which routinely emit man-made chemicals into the air that are inhaled and ingested in diet, result in increased disease risk, including cancer? (PBS-AC-1)

Comment: Overall, the local cancer rate jumped from 3% below the U.S. rate to 2% above. This may appear to be a small increase, but in the 10-year period 1975-84, over 600 additional cancer deaths occurred in Lancaster and York Counties. Perhaps most telling about the NCI data is that rates for almost all cancers most sensitive to the damaging effects of radiation increased. For example, humans exposed to radiation from nuclear reactors have an increased risk of thyroid cancer, due to the presence of thyroid-damaging iodine in reactor emissions. Thyroid cancer deaths were 14% below the U.S. before 1975, but jumped to 28% above after the reactors opened. The same occurred for bone and joint cancer, and multiple myeloma (bone marrow cancer), sensitive to bone-seeking radioactive chemicals such as strontium and barium (see below). The local breast cancer death rate increased significantly. A final indicator that Peach Bottom releases contributed to unusually high cancer rates was the rise in cancer deaths among children under age 10 living in Lancaster and York counties. Children are most susceptible to diseases caused by environmental pollutants such as nuclear power plant emissions. (PBS-AC-11)

Comment: In 1985, the Pennsylvania Health Department began to collect cancer cases (as opposed to deaths) for the first time. Their files are complete throughout 1998. During that period, the total number of cancer cases rose 48%, from 4280 to 6313. During the same period, the number of new breast cancer cases diagnosed in women nearly doubled, from 609 to 1135. Over half of this increase took place in the most recent four years (1994-98), making the issue a current one (see below). The number of thyroid cancer cases jumped from 26 to 110 from 1985 to 1998 (see below). Again, the large increase from 1994 to 1998 (72 to 110) makes thyroid cancer a present concern. (PBS-AC-12)

Comment: Current (1998) local rates of all cancers, breast cancer, and thyroid cancer exceed the U.S. average, by 7.3%, 19.9%, and 28.3%, respectively. (PBS-AC-13)

Response: The comments are noted. To the extent that these comments question the radiological protection afforded by NRC regulations, radiation doses to the public during the license renewal term are a Category 1 issue as evaluated in the GEIS. Doses to members of the public from Peach Bottom Units 2 and 3 emissions were specifically evaluated in Section 4.6 of the GEIS, using data from monitored emissions and ambient monitoring, and were found to be well within regulatory limits. The evaluation of health effects of radiation, both natural and man-made, is an ongoing activity involving public, private, and international institutions. The assessment of health effects upon which the GEIS analysis is based was founded on the consensus of these sources. No changes in that consensus have occurred since the GEIS was completed. The comments will not be evaluated further.

Comment: Now, in human health aspects we need to include the current research on things like a strontium-90 disposition in baby teeth like the Tooth Fairy Project folks have been doing. (PBS-M-7)

Comment: I know the government stopped looking at that, on the strontium-90 impacts in the milk supply and in humans after many years. But the amount that is being found in this private research recently is as high as was found in the atmospheric bomb testing in the '40's and 50's. And so this is definitely something that needs to be included in the environmental impact statement as well as looking at other epidemiological studies on things like infant mortality where they are finding infant mortality dropping in communities around nuclear reactors after they have closed. (PBS-M-8)

Comment: Health Studies Are Lacking. There has been a dearth of scientific, peer-reviewed studies evaluating disease rates near U.S. nuclear power plants since the first reactor began operations in 1957. Only one national study has been done. In 1990, at the insistence of Senator Edward M. Kennedy, the National Cancer Institute published data on cancer near nuclear plants. While the study concluded that there was no connection between radioactive emissions and cancer deaths, rates near many reactors rose after reactor startup. Since 1990, no federal agency, including the Environmental Protection Agency and Nuclear Regulatory Commission, has undertaken any studies of disease rates near nuclear plants. (PBS-AC-5)

Comment: In-Body Measurements Are Lacking. The lack of health studies near American nuclear reactors is complemented by a lack of measurements of in-body levels of radioactivity for persons living near nuclear reactors. Government-supported programs to measure Strontium-90 in St. Louis baby teeth (4) and in New York City and San Francisco bones (5) were terminated in 1970 and 1982, respectively. Both measured the effects of bomb test fallout rather than nuclear power reactor emissions. (PBS-AC-6)

Comment: Of all man-made radioactive chemicals, Sr-90 was the one that caused the greatest health concern during the atmospheric bomb test years in the 1950s and 1960s. (PBS-AC-7)

Comment: Link Between Sr-90 in Teeth and Childhood Cancer -- Long Island. The largest number of teeth (563) have been measured for residents of Suffolk County New York, site of the Brookhaven National Lab and surrounded by nearby reactors. Results show that the average level of Sr-90 has steadily increased 40.0% from the early 1980s to the mid-1990s. Because U.S. above-ground bomb testing ceased in the early 1960s, and old bomb fallout is decaying

steadily, this trend indicates that a current source of radioactive emissions is contributing to the buildup of Sr-90 in teeth. This source can only be nuclear reactors. During the same time period, the rate of cancer diagnosed in Suffolk County children less than 10 years old steadily rose a nearly identical 48.9% (10). The data support the theory that exposure to radioactivity increases the risk of cancer, especially in young persons. (PBS-AC-8)

Comment: Strontium-90 in Baby Teeth. While the majority of teeth have been received from California, Florida, New Jersey, and New York, 33 are from children born after 1979 in southeastern Pennsylvania or in Maryland. (After 1979, virtually all strontium-90 in baby teeth was generated from nuclear reactors, rather than atomic bomb test fallout left over from the early 1960s). The average Sr-90 concentration in these teeth is higher than any of the four states with large numbers of teeth (CA, FL, NJ, and NY), and more than 60% greater than the national average. Virtually all of these 33 teeth are from persons living within 55 miles of Peach Bottom. (PBS-AC-10)

Comment: These developments indicate that efforts to protect humans from the potentially harmful effects of exposure to radioactive emissions in the environment will be critical. (PBS-AC-15)

Response: The comments are noted. The staff considers the interest in Sr-90 in baby teeth to be within the scope of this license renewal environmental review, and will discuss the results of its assessment of the issue for the Peach Bottom license renewal in Chapter 4 of the SEIS.

7. Comments Concerning Category 2 Socioeconomic Issues

As stated in 10 CFR Part 51, Table B-1, Category 2 socioeconomic issues are:

- Housing
- Public services: public utilities
- Public services, education (refurbishment)
- Offsite land use (refurbishment)
- Offsite land use (license renewal term)
- Public services, transportation
- Historic and archaeological resources.

Comment: The plant provides hundreds of local and regional residents good-paying jobs. (PBS-A-1)

Comment: For example, the county-affiliated Delta Senior Center has received thousands of dollars in money and equipment from Exelon during my tenure as commissioner. (PBS-A-2)

Comment: The county, school district and host municipality also derive significant tax revenue from the plant. (PBS-A-3)

Comment: By extending Peach Bottom Atomic Power Station's operating license, the NRC will help ensure at least two more decades of growth, opportunity and prosperity in York County. (PBS-A-5)

Comment: It means jobs for approximately 1000 people over that period of time. (PBS-C-5)

Comment: It means a positive impact on the local economy, as covered by Chris: taxes and services, plant employees and their families living in the area. (PBS-C-6)

Comment: It means support of the community. We get very much involved in community activities around the plant. Mason-Dixon Business Association, the Delta Peach Bottom Elementary School. We have a program going there called School Buddies where employees from the power plant team up with the teachers at the school and visit the school on a regular basis to talk to the students -- a very successful program not only for the students but I would say for the employees also. It really builds morale. (PBS-C-7)

Comment: Thousands of dollars are contributed to the United Way by our employees at Peach Bottom. Hundreds of pints of blood go to the American Red Cross each year. There's little league coaches. There's PTA presidents. There's a lot of volunteer firemen. There's a lot of church leaders, all coming out of Peach Bottom. And that's an impact that we have on the plan. (PBS-C-8)

Comment: And one of the reasons that my business is so successful is because of the business that Exelon or PECO brings into our community. Throughout the years, PECO has created a significant growth for my business because we cater their seminars, their training classes, their meetings. (PBS-E-1)

Comment: And most of all, directly into this community PECO is creating an influx of people into the area from subcontractors, and there are even their own employees. And these people spend in the community. (PBS-E-2)

Comment: Just like my business, I'm sure that other businesses, from local supermarkets and gas stations and other businesses in the community live in a great deal because of PECO. (PBS-E-3)

Comment: We cannot afford a big company like PECO to leave our community. (PBS-E-4)

Comment: And third of all, PECO has also maintained great parks into our community. It donates to our fire department. It also donates to our local ambulance groups. (PBS-E-7)

Comment: I am proud of this community and I realize that PECO is probably one of the economic hearts of our community. It's an asset to our community. (PBS-E-9)

Comment: Most of the 371 members I have spoken about live in the York and Lancaster areas, more importantly depend on the safe and good-paying jobs that support their families and this community. (PBS-F-1)

Comment: The Peach Bottom Power Plant has been a good economic factor with regard to construction and maintenance. (PBS-H-2)

Comment: Wherever you go throughout this state or throughout the region, that this corporation has been -- they have always been based in the community, have helped the community, and they have always been support of the community and in essence part of the community. And although there are certain corporate profits that you go after because of being a business, you know, you can't take a side of those other aspects where they have been involved in the community. (PBS-I-4)

Comment: We have a good working relationship with Exelon PECO as far as them donating money to the community for the fire company. (PBS-V-1)

Comment: Just as critical, however, is the importance of Peach Bottom Atomic Power Station to York County. The plant provides hundreds of local and regional residents with good-paying jobs. But more importantly, Peach Bottom is an outstanding corporate citizen and neighbor. (PBS-AH-3)

Comment: The York County Chamber of Commerce represents 2200 members who have directly or indirectly benefited from having the Peach Bottom Nuclear Power Plant operating in our county. We have confidence that Exelon Corp. will continue to invest in the facility and operate it with the highest safety standards. (PBS-AJ-3)

Response: The comments are noted. Socioeconomic issues specific to the plant are Category 2 issues and will be addressed in Chapter 4 of the SEIS. The comments support license renewal at PBAPS.

Comment: It is our opinion the relicensing of this facility, without some mitigation measures being employed to preserve and protect this historic property, will result in the continued deterioration of the portion of the Feeder Canal which was bisected by the transmission line (36 CFR 800.(5)(b)(vi)). We suggest these mitigation measures should include: 1) the restoration of the depth and width of the Feeder Canal across the transmission line; 2) the construction of a simple bridge to permit vehicular access across the Feeder Canal for routine transmission line Right-of-Way maintenance; and 3) monitoring of the transmission line Right-of-Way to prevent uncontrolled crossing of the Feeder Canal by dirt bikes and ATVs and the repair of damage resulting from such uncontrolled crossing, if they do occur. (PBS-AK-1)

Response: The comment is noted. Issues concerning historic and archeological resources are Category 2 issues and will be addressed in Chapter 4 of the SEIS.

Comment: Peach Bottom Nuclear Power Plant is located in a relatively low income, rural community without much political clout. This is environmental injustice. (PBS-Z-29)

Response: The comment is noted. Environmental Justice will be addressed in Section 4.4 of the SEIS.

8. Comments Concerning Category 2 Aquatic Ecology Issues

As stated in 10 CFR Part 51, Table B-1, Category 2 aquatic ecology issues are:

- Entrainment of fish and shellfish in early life stages
- Impingement of fish and shellfish
- Heat shock

Comment: We request that within the scope of the NRC's Environmental Assessment, as a Category 2 issue, the NRC conduct a thorough evaluation of the potential impact of license renewal for PBAPS on the restoration of migratory fishes to the Susquehanna River and Chesapeake Bay utilizing all relevant and current information. (PBS-AG-1)

Response: The comment is noted. The comment relates to aquatic ecology issues and will be discussed in Chapters 2 and 4 of the SEIS.

Comment: Have studies been conducted or will they be conducted to quantify the cumulative radioactive buildup in the Susquehanna River water, bed, or local area surface soil or aquifer? And additionally, if those studies have been made, have projections been made as to the extended plant life, what that will do to it, based on those studies? (PBS-J-1)

Comment: I think you said you do study the effect of the wildlife in the Susquehanna River. It would be nice to have a study before the plant was built so we could have some sort of benchmark for that. (PBS-P-6)

Response: The comments are noted. The comments relate to cumulative impact issues and will be discussed in Chapters 2 and 4 of the SEIS.

9. Comments Concerning Alternatives

Comment: I would much rather see Peach Bottom continue to operate rather than other viable alternatives for electric power generation which are more polluting and actually more difficult to control the pollution. (PBS-J-5)

Comment: Now, as for alternatives, I understand the EIS would be looking at alternatives to having nuclear generation in the first place. And I strongly encourage that. I think this needs to look at not only other forms of generation but other forms of demand management needs to look at conservation efficiency, needs to look at the studies and supply some written testimony. (PBS-M-14)

Comment: We also need to look at things like wind generation. (PBS-M-16)

Comment: We also need to look at solar generation where KPMG, which is an international -- it is a very well-known auditing firm -- has actually done a report looking at what it would take to make solar power affordable, what it would take to get to the point where we don't have this trouble where people aren't willing to pay so much for it and that's why it is not cheap enough because they don't make enough of it. (PBS-M-17)

Comment: And it should include alternative generation sources as in: What is the impact of keeping this reactor operational as opposed to, oh, say, building a bunch of wind turbines? (PBS-N-5)

Comment: And I also believe that we should use renewable resources for energy and if necessary replace the Peach Bottom Power Plant, to shut it down and implement a decommissioning process. (PBS-P-12)

Comment: There are alternative methods available to these companies that will produce power for the needs of our communities and for those outside of our area who also need power. (PBS-Q-4)

Comment: So there surely must be a better way to generate electricity without slowly killing not just the human population or not just the animal population. (PBS-S-5)

Comment: You certainly find another way generate electricity besides poisoning the population, destroying the land, destroying the animals, destroying the fish, destroying the drinking water. (PBS-S-7)

Comment: For these reasons, I think we need to begin to look for alternate ways to make electricity and take this weapon out of the hands of our enemies. (PBS-U-4)

Comment: If the real, honest reason for nuclear power is to create electricity, there are smarter, cleaner, safer and cheaper ways. (PBS-Z-33)

Comment: Just imagine if we spent the money we currently spend mining uranium, splitting the atoms to make plutonium to create heat, to boil water to turn turbines making electricity and then cleaning up and storing the resulting radioactive wastes for millions of years -- if we took this money and instead used it for conservation, solar and wind, we'd probably still have some left over and no nuclear waste to worry about. Any other decision seems just plain stupid. (PBS-Z-34)

Comment: Rather than further pillage our environment for more dirty power, we can start today with policies which promote conservation, efficiency and CLEAN renewables (like wind and solar) to replace our dirty and wasteful power system. (PBS-AA-1)

Comment: Conservation and efficiency have a large potential to reduce our electricity needs. (PBS-AA-2)

Comment: Solar power, if it were only affordable, has the power to fill the entire country's energy needs -- using existing rooftops and other already paved surfaces. (PBS-AA-3)

Comment: Wind power, according to the U.S. Department of Energy, can provide more power than the entire nation's electricity needs. (PBS-AA-4)

Comment: Alternative sources of energy need to be developed and the goal should be to strive to that end by 2014, and/or build more hydro-electric plants rather than renew a contract at an aging nuclear facility. (PBS-AB-2)

Comment: Specifically, in the Peach Bottom supplemental EIS, the NRC should conduct a comprehensive analysis addressing costs and environmental impacts of available conservation technologies. Further, the NRC should sincerely and honestly consider the potential of those technologies and energy efficiencies as the preferred alternative to license renewal. (PBS-AE-4)

Response: The comments are noted. Impacts from reasonable alternatives for the Peach Bottom license renewal will be evaluated in Section 8 of the SEIS.

10. Comments Concerning Category 1 Uranium Fuel Cycle and Waste Management Issues

As stated in 10 CFR Part 51, Table B-1, Category 1 uranium fuel cycle and waste management issues include:

- Offsite radiological impacts (individual effects from other than the disposal of spent fuel and high level waste)
- Offsite radiological impacts (collective effects)
- Offsite radiological impacts (spent fuel and high level waste)
- Nonradiological impacts of the uranium fuel cycle
- Low level waste storage and disposal
- Mixed waste storage and disposal
- On-site spent fuel
- Nonradiological waste

Comment: The other matters of importance are the availability of domestic uranium to fuel such a facility. In order to keep the United States dependency on foreign energy supplies to a minimum, the nuclear option must be kept intact, and expanded, for part of this would be to license existing nuclear facilities. (PBS-H-4)

Comment: The issue is spent fuel storage. I fully understand that the problem as it exists today is a political problem and I am here to add weight to the NRC's ability potentially to get the politicians to come to a hasty, safe solution to that problem to remove the potential problems that occur as a result of local storage. (PBS-J-6)

Comment: I think there is more than a political discussion prohibiting those wastes from being deposited. But be that as it may, we do have a problem with high-level waste storage now at this plant. It was not intended to be that way. I think that this is a very serious issue that we have to address and this agency has to address in any hearings that are going to be conducted in terms of this licensing. (PBS-O-1)

Comment: I am also concerned, as Kip was, with the spent radioactive fuel, the spent fuel that is stored on site. There is a large amount of it there. As I said, with the earthquake, that is a great danger. (PBS-P-10)

Comment: Spent fuel pools have frightened me ever since I first learned that Peach Bottom was having a problem with theirs, with the re-racking. (PBS-T-3)

Comment: The spent fuel problem, like I said, began at Peach Bottom many years ago. All it would take for a spent fuel pool to go would be loss of coolant. (PBS-T-8)

Comment: Is there any kind of a backup plan? What can you really do if you just lose coolant at a spent fuel pool? (PBS-T-9)

Comment: We have no way of cleaning up nuclear power. All we can do is store it. And how do you be sure that you can store something safely for hundreds of thousands of years. (PBS-W-3)

Comment: I would ask that you take into consideration the fact that how do we store this. One gentleman said it is not safe to store it on site. Where is it safe to store? It certainly isn't Yucca Mountain, which the nuclear industry has tried over and over and over again to get. (PBS-W-5)

Comment: Okay, suppose they get the okay to do that site. Well, guess what? We're going to fill lots of trucks and trains with this radioactivity to take it all around the country from all these nuclear power plants to whatever site they decide. Well, you know, a while back we had a train that wrecked in a tunnel under Baltimore City. It could have been nuclear. It would have been a lot worse. So when we talk about the environmental impact statement I would ask that you consider individual lives. (PBS-W-6)

Comment: In fact, it seems that there is no really safe way to dispose of spent fuel rods (waste) from these plants. Transporting them across the country is playing an extremely dangerous game for obvious reasons. Leaving them on site presents enormous additional risks to the surrounding populations, as they are potentially much more harmful than even the radiation escaping from nuclear power plants on a daily basis. (PBS-Y-8)

Comment: The EIS on Peach Bottom should include the entire nuclear fuel cycle, beginning with uranium mining. (PBS-Z-13)

Comment: Also not considered is the political corruption and harm to indigenous cultures required to open and run the mines in the first place. (PBS-Z-14)

Comment: It can't be thrown away -- there is no "away." It can't be cleaned up. It can only be stored. How do you plan safe storage for something that will remain toxic longer than humankind has been on the face of this earth? You can't, plain and simple. The technology to manage this waste for that amount of time does not exist. (PBS-Z-22)

Comment: "Low level" waste is still radioactive and can stay toxic just as long as "high level" waste. (PBS-Z-23)

Comment: There is no safe location to store radioactive waste. Where it gets stored is a matter of politics, not safety. (PBS-Z-25)

Comment: Yucca Mountain, a Western Shoshone sacred site, has been targeted for radioactive waste storage. It will hold only 20% of the total spent fuel earmarked for it. It is inappropriate due to, among other reasons, contamination of a drinking water aquifer under the mountain, and its being in an extremely active earthquake zone. (PBS-Z-26)

Comment: Using DOE data, it is estimated that between 70 and 310 accidents and over 1000 incidents would occur if trucks are used and over 50-260 accidents and over 250 incidents if trains are used. The DOE estimates that a severe accident in a rural area releasing a small amount of radiation would contaminate 42 square miles for over a year. That same accident in an urban area would have devastating consequences to the economy and public health. (PBS-Z-27)

Comment: Does the buildup of nuclear waste from reactor operations pose a threat to the health of local residents? (PBS-AC-3)

Comment: And the longer a reactor operates, the more nuclear waste it generates. The nation still has no workable solution for the disposal of deadly nuclear waste. (PBS-AE-3)

Response: The comments are noted. Onsite storage of spent nuclear fuel is a Category 1 issue. The safety and environmental effects of a long-term storage of spent fuel onsite have been evaluated by the NRC and, as set forth in the Waste Confidence Rule, the NRC generically determined that such storage could be accomplished without significant environmental impact. In the Waste Confidence Rule, the Commission determined that spent fuel can be stored onsite for at least 30 years beyond the licensed operating life, which may include the term of a renewed license. At or before the end of that period, the fuel would be moved to a permanent repository. The "Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS)," NUREG-1437 is based upon the assumption that storage of the spent fuel onsite is not permanent. The plant-specific supplement to the GEIS that will be prepared regarding license renewal for PBAPS will be based on the same assumption.

Likewise, the matter of processing and storage of low-level waste is considered a Category 1 issue. The conclusion regarding this issue in the GEIS included consideration of the long-term storage of low level waste on site during the license renewal term. The comments provide no new information and, therefore, will not be evaluated further.

Comment: An amendment to a contract between PECO and the Department of Energy allows PECO to store spent nuclear fuel and high level radioactive waste produced at other plants to be stored at Peach Bottom. PECO could use the Peach Bottom Site to store an unlimited amount of this waste from other facilities. So, the EIS should consider all ramifications of this, including the storage of all SNF/HLW at Peach Bottom and all the problems associated with transportation of that waste to Peach Bottom. (see transportation). (PBS-Z-24)

Response: Staff has reviewed Amendment to Contract DE-CR01-83 NE44405 between U.S. Department of Energy and PECO Energy Company. Article VII, part 11 states that “Nothing in this Article shall preclude the Purchaser’s storage of other SNF/HLW at the Peach Bottom ISFSI as long as the Purchaser complies with applicable federal, state and local laws and regulations.” However, Article VII, part 8 states that “DOE shall not store any SNF/HLW other than Peach Bottom SNF/HLW at the Peach Bottom ISFSI.” While this agreement states that it does not preclude the storage of spent nuclear fuel or high level waste at the Peach Bottom plant in the future, the agreement does not grant Exelon permission for this type of storage. The license for the Peach Bottom plant currently does not allow storage of spent nuclear fuel or high level waste other than that generated at the Peach Bottom plant. If the licensee seeks to accept waste from other facilities for storage at the Peach Bottom plant, then a license amendment would be required. The process for amending the license, including requirements for public notice and an opportunity to request a hearing, can be found in 10 CFR Part 72. The licensee has not submitted an application for an amendment to the license to allow this activity and staff is not aware of any plans by the licensee to do so. The comment provides no new information and will not be evaluated further.

11. Comments Concerning Postulated Accident Issues

As stated in 10 CFR Part 51, Subpart A, Appendix B, Table B-1, design basis accidents is the only Category 1 issue associated with postulated accidents. For severe accidents (i.e., beyond design basis accidents), the staff concluded that the probability-weighted environmental consequences from severe accidents are small for all plants, but that alternatives to mitigate severe accidents must be considered for all plants that have not considered such alternatives. See 10 CFR 51.53(c)(3)(ii)(L).

Comment: There has been a lot of work done on these containments, but Mark 1 containments, especially being smaller with lower design pressure and in spite of the suppression pool, if you look at the WASH-1400 reg safety study you will find something like a 90-percent probability of that containment failing. (PBS-M-12)

Comment: Now, there have been some measures to address those concerns that NRC had. But we are still looking at the fact that the control room operators would have to make a decision in the case of an emergency core cooling system activation on whether or not to vent the containment in order to save it. And that is not something that should be seen as acceptable impact on the environment. (PBS-M-13)

Comment: Another concern I have with the Peach Bottom Power Plant is the possibility of an earthquake causing a problem. And I know a lot of people kind of think that might be funny. But

there is a fault line called the Martick Fault Line that runs about, I would say, less than 10 miles north of here. And if there is a major earthquake along that line, that could cause a lot of problems. (PBS-P-3)

Comment: Martick Fault Line. [see comment PBS-P-3] (PBS-Q-3)

Comment: According to a report by Sandia National Laboratories on November 1, 1982, called Calculation of Reactor Accident Consequences (CRAC-2), the "peak early deaths" from an accident at Peach Bottom are estimated at 72,000, with "peak early injuries" estimated at 45,000. (PBS-Y-2)

Comment: Pottstown would also be strongly affected by escaping downwind radiation in case of an accident at Peach Bottom caused by operators. If prevailing winds blow at about 10 miles per hour, harmful radiation would arrive in Pottstown in as little as 5 hours after the accident. (PBS-Y-4)

Comment: Peach Bottom is a General Electric Boiling water reactor, an obsolete design that is no longer built or constructed, inferior to pressure water reactors. Peach Bottom's Mark I containment structure has been demonstrated by Sandia Laboratories to be likely to fail during a core melt accident (like Three Mile Island), allowing radiation to escape directly into the environment. This was corroborated by a February 1987 NRC study. Industry officials say the problem with Mark I is that it is too small and wasn't designed to withstand the pressure it is supposed to resist. In Feb. 1989, the NRC recommended plants using the Mark I shell to modify the structure to reduce the risk of failure during an accident. Clearly showing its arrogance and lack of concern for the safety and health of workers and citizens, PECO said it would only make the \$2-5 million changes if forced to do so. (PBS-Z-15)

Comment: Accidental releases from either the containment vessel or the waste storage area would be devastating to local health. High levels of radioactivity would quickly enter the atmosphere and be inhaled by local residents. These poisonous chemicals would later be brought to earth by precipitation, and enter the water and food supply for months and years to come, as some chemicals decay more slowly than others. Estimates of casualties after a nuclear accident were made by Sandia National Laboratories in New Mexico shortly after the partial core meltdown at Three Mile Island in 1979. These estimates were presented as the Calculation of Reactor Accident Consequences (CRAC-2) report presented to Congress on November 1, 1982. CRAC-2 estimates an accident at Peach Bottom would cause 72,000 "peak early deaths" and 45,000 "peak early injuries" soon after it occurs. These figures should be seen as a minimal estimate of the health risk of such an accident. (PBS-AC-14)

Response: The comments are noted. Severe accidents, including events initiated by earthquakes, were evaluated in the GEIS and the impacts were determined to be small for all plants. A site-specific analysis of Severe Accident Mitigation Alternatives for Peach Bottom will be performed by the NRC staff within this environmental analysis. The comments provide no new information and will not be evaluated further in the context of the environmental review.

12. Comments Concerning Issues Outside the Scope of License Renewal

Operational Safety

Comment: They work with us on planning issues and on training issues. (PBS-B-1)

Comment: So when we think back to those horrible times, to September 11th, York county is rather well prepared because of the nuclear industry. Peach Bottom has been a viable partner in that. (PBS-B-2)

Comment: We have been over five million man-hours without a lost-time accident down at Peach Bottom. That's a long time. It has been years since we have had somebody miss work because of an injury. (PBS-C-2)

Comment: That is our watchdog organization out of Atlanta. And they come around once every two years and do a very thorough evaluation to the plant. Two years ago we were evaluated and we got the highest rating that they have -- excellent -- in the NRC that continuously evaluates us and in general evaluates us very well with all categories. (PBS-C-4)

Comment: And Exelon is so confident about the safe operation of our nuclear power plants that our long-term plans are to renew the licenses on all of our plants. (PBS-D-1)

Comment: I guess what I would like to do is to try to convey that we believe that Peach Bottom has operated safely since 1973, well continue to operate safely. And if the NRC grants us the additional 20 years, we will continue to operate for another 20 years and will be able to generate over 2,300 megawatts of clean, reliable, safe, environmentally benign electricity that all of us will benefit from. (PBS-D-6)

Comment: The other issue that comes to mind when I live beside a nuclear power plant is safety. The degree which I obtained in engineering has taught me that these structures are extremely strong. I feel very, very comfortable to live beside a nuclear power plant. (PBS-E-5)

Comment: Just about three weeks ago, I was into Heritage Festival. We were raising money for our community. And I saw Jay at the festival, the vice president, taking part into community organizations. For this reason, I believe that PECO is a safe establishment. I feel comfortable living beside PECO and working into this community. (PBS-E-8)

Comment: But I would like to take a moment to talk about something probably of primary importance to this local union. And that is job safety. Very simply, I have never had the pleasure of referring sheet metal workers to a job site with such an impeccable -- impeccable -- safety rating that this facility has. Listen, with the rise of deaths and injuries to construction workers, slight rise in the United States, I can only tell you and wish that all the jobs that my members go to, I wish that their employers had that kind of commitment. (PBS-F-2)

Comment: I have a pretty close affinity for safety and the emergency processes they go through in the plant. When we talk about safety and we talk about quality, and it's all there. (PBS-G-1)

Comment: One of the biggest things that we talked about in ourselves is that one of the first things we are responsible for is protecting the public. And we always felt that if we could protect ourselves and we're safe in the plant, the public didn't have anything to worry about. And we operated the plant safely and did a good job. (PBS-G-2)

Comment: We, in the construction trades, have seen the reduction of radiation exposure and a record of one million man-hours without a lost-time accident. (PBS-H-3)

Comment: It is our belief as citizens and tradesmen who worked on the Peach Bottom Atomic Power Station, with a history from day one to the last refueling outage, that clean, safe and efficient electrical generation is what is needed to move forward into the 21st Century. (PBS-H-6)

Comment: I think maybe for the people in the area to really witness this, as far as my research with the Nuclear Energy Institute I know some of the bases for relicenses in some of the previous stations have taken place has been based heavily on the environmental impact and also the safety situation of the plant. (PBS-I-1)

Comment: The refinement of the safety is unbelievable when you go into these facilities. And when we went around to public hearings and public meetings even to keep Limerick alive at that time, 20 years ago, it was the fact that, you know, the most important situation we were concerned about, the safetiness of our people and the safetiness of the community. (PBS-I-2)

Comment: I mean, if we didn't have safety, then it wasn't worth one job if those two areas were in jeopardy. (PBS-I-3)

Comment: And what has been the main concern of all the unions and the building trades as we accelerate these schedules that the areas are safe and the same thing with the community that we live in. (PBS-I-5)

Comment: So I think that is important to realize, that that teamwork, the safety, the consciousness of, and our people as far as training working in these facilities. My own trade alone, we have 168 training centers throughout the country. Local 19 has two main training centers. Especially in this area, of when you are talking to the building trades unions in Pennsylvania, they probably have some of the best training centers in the country. And it wasn't uncommon for us to be trade-specific as far as certification, one process, if something had to take place at the plant. (PBS-I-7)

Comment: It has been -- it's safe. (PBS-I-9)

Comment: And when you talk about the efficiency standpoint, I think these are the wise choices that we extend the license of this plant and other plants that meet those conditions of safety and the environmental impact. (PBS-I-11)

Comment: So as the Sheetmetal Workers International Union, we would just go on record with the NRC panel that we endorse the extension of the license of Peach Bottom and that we can move forward, you know, with other safe facilities also because I think it is important for our nation. (PBS-I-12)

Comment: We fully expect that the NRC will continue their diligence in providing oversight on the facility. (PBS-AJ-4)

Response: The comments are noted and generally supportive of license renewal at PBAPS. Operational safety is outside the scope of evaluation under 10 CFR Part 51 and 54. The comments provide no new information and, therefore, will not be evaluated further.

Comment: Also I would like to comment for those of the public who may not have been here during the mid '80s that this plant had gone through some serious operator problems. It was the only plant ever to be shut down, license suspended for two years because of operator incompetence. (PBS-O-2)

Comment: I think the past performance needs to be taken into account when doing a study of the plant. And that includes when control room operators were sleeping on the job. (PBS-P-8)

Comment: We have done numerous training exercises every year down there. We have EMS, fire, inside, outside, in the plant, every place in there. So we have had a good working relationship. As far as my opinion of them, they have been excellent to work with. (PBS-V-2)

Comment: This is more than likely because it is NOT safe. Nuclear power in general is not safe and Peach Bottom specifically is not safe. If safety and the environment had honestly been factors, Peach Bottom Atomic Power Plant would not have been licensed in the first place. (PBS-Z-6)

Comment: A reactor's fuels rods, pips, tanks and valves can leak. Mechanical failure and human error can also cause leaks. As a nuclear plant ages, so does its equipment, and leaks generally increase. (PBS-Z-16)

Comment: Radioactive releases from the reactor's routine operation are often not fully detected or reported. Accidental releases may not be completely verified or detected. The NRC relies upon self-reporting and computer modeling from reactor moderators to track radioactive releases and their projected dispersion. A significant portion of the monitoring data is virtual, not real. Increased economic pressures to reduce costs due to deregulation could reduce the monitoring and reporting of releases and deferred maintenance can increase the amount released and the risks. Accurate reporting of all radioactive wastes released to the air, water and soil from the entire reactor fuel production system is simply not available. Plutonium residues have been found in the bodies of creatures worldwide, pole to pole. (PBS-Z-18)

Comment: Peach Bottom is the only nuclear plant to be shut down by the NRC. (PBS-Z-20)

Comment: Peach Bottom is consistently ranked by Public Citizen as one of the poorest rated nuclear power plants in the country. (PBS-Z-21)

Response: The comments are noted. The NRC's environmental review is confined to environmental matters relevant to the extended period of operation requested by the applicant. Operational safety is outside the scope of this review. An NRC safety review for the license renewal period is conducted separately. Although a topic may not be within the scope of review for license renewal, the NRC is always concerned with protecting health and safety. Any matter

potentially affecting safety can be addressed under processes currently available for existing operating license absent a license renewal application. The comments provide no new information, and do not pertain to the scope of license renewal as set in 10 CFR Part 51 and Part 54.

Emergency Preparedness

Comment: But I want to know, what is the evacuation plan for the Amish? I mean, most of us can get in a car and drive away. But there are several thousand Amish in Lancaster County, which is where I live. What is the evacuation plan for them? Are there lots of buses ready? I don't know. (PBS-P-1)

Comment: And the last thing I will mention is that there were some siren problems, that the sirens were going off at the wrong times. I know they go off the first Wednesday at 1 o'clock; I hear them. And that is also something that needs to be looked into. (PBS-P-13)

Comment: So-called evacuation plans. I was here when that took place. What a joke. Chaos, mass chaos. We have no need for our area to take these risks. (PBS-Q-7)

Comment: Maryland Route 136 is heavily traveled and I did not see it cited in the application. I would like to see consideration to Northern Hartford County and I would like for it to be considered as well as part of this renewal process. (PBS-R-1)

Comment: Recently -- I don't know, in the last year or so -- the alarms for Peach Bottom went off in the middle of the night. And I wonder how many people actually got out of their beds, turned on the radio or the TV, or actually got out of their beds and got in the car to evacuate. I didn't. Those sirens have gone off before and it was a mistake. (PBS-W-1)

Comment: The feasibility of moving all these people out quickly on limited country roads seems to be a problem. And how will the Amish evacuate -- on their horse and buggies? Also, what are the plans for evacuating all of the livestock, all the other animals and creatures and plants, and the whole environment, soil, and water? How far do we evacuate when the danger is carried in the air and water? Plutonium has been found in the bodies of animals worldwide pole to pole. (PBS-Z-28)

Response: The comments are noted. The NRC's environmental review is confined to environmental matters relevant to the extended period of operation requested by the applicant. Emergency preparedness is outside the scope of this review. An NRC safety review for the license renewal period is conducted separately. Although a topic may not be within the scope of review for license renewal, the NRC is always concerned with protecting health and safety, and the adequacy of emergency planning. Any matter potentially effecting safety can be addressed under processes currently available for existing operating license absent a license renewal application. The comments provide no new information, and do not pertain to the scope of license renewal as set in 10 CFR Part 51 and Part 54. Therefore, they will not be evaluated further.

Two commenters expressed concerns about the notification and evacuation of Amish residents in the case of an emergency. In a nuclear emergency, Peach Bottom staff would make

recommendations to the state and county officials. The final responsibility for the decision to implement any recommendations lies with the state and is executed together between state and county emergency management personnel. This is to allow for organized, well-planned, orderly responses to protect the health and safety of all people.

The NRC staff has an ongoing program for determining the adequacy of offsite emergency plans, and is supported in that role by the Federal Emergency Management Agency (FEMA). Drills and exercises are conducted periodically to verify the adequacy of the plans. If a problem is identified, the NRC staff would not wait until a license renewal review to resolve it. Also, the Commission has determined that offsite emergency planning is excluded from the license renewal process.

Safeguards and Security

Comment: I have to say a little bit about security. We have a very, very good security program at Peach Bottom and we have been improving it. It has been getting better and better and better over the years. We have been very successful in tests and drills that we run with our security program. (PBS-C-9)

Comment: Now, after September 11th we have expanded that security in cooperation with the State of Pennsylvania. We have expanded the security program around the power plant. We certainly can't talk about it too much for obvious reasons. But I can tell you that it is a major focus in the power plant right now and we feel that we are adequately protecting the power plant, protecting employees of the power plant, and of course protecting the public around the power plant. (PBS-C-10)

Comment: We cannot change our way of life. And that's why we are in a war with terrorism and not in a war with nuclear power plants. (PBS-E-6)

Comment: Their groups have actually made specific threats against going after U.S. nuclear facilities and actually waged an attack on an electrical substation as part of their exercise in training. (PBS-M-1)

Comment: Now, because of the 11th and since then, we must consider attacks as part of the consequences and the environmental impacts of any nuclear power reactor in this country, not only accidents. (PBS-M-2)

Comment: We need to consider severity as high as plane attacks and suicide missions. It is very clear that nuclear reactors are not built to withstand the type of attack that happened in September 11th. (PBS-M-3)

Comment: In the media they keep saying that the containment is two feet, three feet, four feet. Eventually the more recent reports in the media have been talking about them being 10 or 12 feet thick. It is getting ridiculous how rapidly these containments are growing. However, we need to honestly look at what they can actually withstand. And they cannot withstand something like what happened on the 11th. (PBS-M-4)

Comment: We also need to look at the force-on-force attacks, the mock exercise that has been going on where about 50 percent of the nuclear reactors in this country have been failing these tests where they go in and actual have infiltrators infiltrate the reactor in a simulation and get to vulnerable areas where they could cause serious accidents. (PBS-M-5)

Comment: And he is not the only one to have made statements similar to that. And at this time we cannot fail to consider that as a worst-case scenario. (PBS-M-6)

Comment: I think the EIS also needs to include the economic impacts of having things like the National Guard called out, of having F16s on call to fly over TMI and Peach Bottom recently when there are incidents and scares as far as possible terrorist attacks. (PBS-M-10)

Comment: I would also suggest that the scope should include consequences of massive terrorists attacks. That is certainly an environmental impact. (PBS-N-6)

Comment: If you run an airplane into a nuclear reactor you could have hundreds of square miles of land that are uninhabitable for any of our meaningful lifetimes. (PBS-N-7)

Comment: An airplane full of gas and people somewhere near an airport, terrorists, either they missed the opportunity or they have yet to take it. As residents, we bear the risks. National Guard, State Police, the Air Force, it's a bandaid. Don't tell yourself that it isn't because that's what it is. Your plants have weaknesses from the water. Your plants have weaknesses from the air. And yes, that is an environmental impact. (PBS-Q-6)

Comment: I am as concerned as most of the people are, especially in these times with the terrorism. (PBS-T-1)

Comment: And like somebody mentioned before, 30 miles away from TMI they had terrorist training and they did threaten nuclear power plants. (PBS-T-4)

Comment: Now we have the vision etched in our minds and souls of the World Trade Center collapsing. It was bad enough to see airplanes hit it, but the collapse was what really floored and terrorized everybody. And if you think that that is the worst thing you will ever see in your life, just wait till a nuclear plant goes in that type of situation. (PBS-T-13)

Comment: But I believe that September 11th has changed all of that because on September 11th we learned that terrorists could work not as a single person trying to attack something, but in large groups. There were 19 suicide terrorists who worked together at that time. And I don't believe that we have a way to protect nuclear power plants from that kind of concerted effort. (PBS-U-2)

Comment: The terrorists first attacked the World Trade Center in 1993 and they didn't succeed. So they made plans and did succeed eventually. They are now saying that they are going to attack power plants in the United States. (PBS-U-3)

Comment: As you know, the Peach Bottom reactors are not secure, and neither is any other commercial reactor in the country, or the world, for that matter. At this point in time, officials throughout the world are recognizing the multiple vulnerability of nuclear reactors, and sounding

warnings about the need to dramatically increase security precautions even as some of us recognize that the security threat from licensed facilities would remain, even in a locked-down police state. But in this setting, it does not seem prudent for the NRC to move forward with a relicensing application for reactors that are protected primarily by a bodyguard of increasingly obvious lies. (PBS-X-5)

Comment: Pottstown residents would also be harmed in case of a terrorist attack on Peach Bottom. There would be no way to safely evacuate such a heavily populated area. (PBS-Y-5)

Comment: As a concerned resident of Lancaster County, I would like to voice my opposition to the extension of the contract for Peach Bottom to operate beyond 2014. In this new age of terrorism, it seems to me that nuclear power plants have become or have the potential to become a strategic target for future acts of terrorism. What would be the cost of a "Chernoble" [sic] happening in Lancaster County, or for that matter, anywhere in the United States. Prior to 9/11/01, nuclear power has been quite safe. However, it is now a different world in which we live. (PBS-AB-1)

Comment: Public Citizen opposes the relicensing of Peach Bottom nuclear power plant and all nuclear power plants, for reasons of safety and security. Additionally, Public Citizen calls on the NRC to halt relicensing proceedings at Peach Bottom and other nuclear power plants until ongoing reviews of security upgrades at the plants are completed, and it is determined that the plant operators can meet the recommendations that emerge from those reviews (PBS-AE-1)

Comment: I would like to register a vote against the renewal of the license for the Peach Bottom Nuclear Power Plant when the current license expires in 2014. I have always supported the use of nuclear power but in light of the terrorist activities I feel in will not be safe to continue the use of nuclear energy. (PBS-AI-1)

Response: The comments are noted. Some of the comments relate to the adequacy of emergency plans. As noted in the earlier response to emergency planning interests, the NRC staff has an ongoing program for determining the adequacy of offsite emergency plans, and is supported in that role by FEMA. Drills and exercises are conducted periodically to verify the adequacy of the plans. If a problem is identified, the NRC staff would not wait until a license renewal review to resolve it. Also, the Commission has determined that offsite emergency planning is excluded from the license renewal process. In addition, each nuclear plant must have approved emergency and safeguards contingency plans, per 10 CFR Part 50, that are revised periodically. Emergency and safeguards planning are part of the current operating license and are outside the scope of the environmental analysis for license renewal. Any required changes to contingency plans related to terrorist events will be incorporated and reviewed under the operating license.

Although a topic may not be within the scope of review for license renewal, the NRC is always concerned with protecting health and safety. Any matter potentially effecting safety can be addressed under processes currently available for existing operating licenses absent a license renewal application. The comments provide no new information, and do not pertain to the scope of license renewal as set in 10 CFR Part 51 and Part 54. Therefore they will not be evaluated further under this review. However, a copy of these comments will be provided to the project manager who oversees current operating and licensing activities for consideration.

Comment: But if you all think what happened at the World Trade Center was really bad, just picture a nuclear power plant being hit, the spent fuel pool going in an area that could set off one reactor to another and ending up with an electromagnetic pulse. (PBS-T-2)

Comment: A terrorist attack at a nuclear plant would unleash harmful radiation from two sources: a. the reactor core, and b. the spent fuel rods. There is no way to save the health of those exposed as the result of a terrorist attack or an accident. (PBS-Y-9)

Response: The comments are noted. The ISFSI is outside the scope of license renewal. However, appropriate security and emergency preparedness measures have been incorporated into the site security and emergency preparedness plans. The comments provide no new information and do not pertain to the scope of license renewal as set in 10 CFR Part 51 and 52. The comments will not be evaluated further.

Aging Management

Comment: As Jay mentioned, we had to review it to make sure that we have got programs in place to adequately manage aging. And we did that and it was an extensive engineering effort. (PBS-D-2)

Comment: We did a thorough review of the plant from a safety viewpoint and one of the questions that always gets asked is: Well, are you doing new things now that you need to do? Because you want to run it for another 20 years. And as we did that review, we only determined that there were two very small additional programs that needed to be instituted at Peach Bottom to meet the regulations required by Part 54. (PBS-D-3)

Comment: All of the programs we've got in place now, we've had them in place since we started to operate the plant have been designed to manage aging in that plant to make sure that it will meet its safety functions and that those programs we have in place will continue to do that when we run this plant for an additional 20 years. (PBS-D-4)

Comment: And the conclusion that everyone reaches is that Peach Bottom can operate safely for another 20 years. (PBS-D-5)

Response: The comments are noted and generally support license renewal at PBAPS. However, the NRC's environmental review is confined to environmental matters relevant to the extended period of operation requested by the applicant. Safety matters related to aging are outside the scope of this review. An NRC safety review for the license renewal period is conducted separately. The comments provide no new information and will not be evaluated further in the context of the environmental review.

Comment: And with regard to this specific reactor and the design, I think we also need to look back and how -- like what is built for, how well the containment is designed. (PBS-M-11)

Comment: And my final point would be about the age of the plants. And I think there is an issue of embrittlement that had been brought up by NRC back during the TMI days that is going to be a serious issue I think in terms of looking at the equipment as it has been bombarded by

high levels of nuclear activity over the years. And I think that this is going to vastly impact the useful life of the plants. And I would like that to be addressed. (PBS-O-4)

Comment: I am also concerned about embrittlement. (PBS-T-7)

Comment: This is particularly true considering the types and amount of premature reactor component degradation plaguing commercial reactors, and the lack of firm knowledge within the industry and its regulators regarding degradation causes, rates, and effective mitigation strategies. The NRC, licensees and petitioners have opened numerous rule-making dockets attempting to deal with the collective ignorance regarding reactor component degradation, dockets which remain open to this day. This includes an open docket on steam-generator tube repair criteria, for example. Obviously, the ability to resolve tube repair criteria issues, or the more likely failure to be able to do so, has tremendous implications regarding the prudence of reactor re-licensing from a public health and safety perspective, and well as from a financial one. (PBS-X-3)

Comment: More generally, without appropriate and thorough rules governing reactor re-licensing, there is no rational basis for the re-licensing process. It's all just arbitrary action in pursuit of privileged and private agendas. But while dockets regarding rules for current licenses on matters as basic as steam generator tube repair criteria remain open, there is no rational foundation for rules governing reactor re-licensing. Re-licensing should not be allowed to proceed in the face of this ignorance and the resulting speculation about public health and safety consequences of re-licensed nuclear operations. (PBS-X-4)

Comment: Common sense suggests that the older the plant, the more the risks. (PBS-Y-7)

Comment: According to Rosalie Bertell, "In the U.S., a nuclear plant is considered functional for between 15 and 30 years, due to building contamination with radioactive chemicals and structural deterioration. Concrete only lasts 30-40 years." (PBS-Z-19)

Comment: Does the aging of reactors increase the chance of a serious accident? (PBS-AC-2)

Comment: Public Citizen has long opposed relicensing of nuclear power plants, because safety risks increase as reactor components age. (PBS-AE-2)

Response: The comments are noted. As noted above, the NRC's environmental review is confined to environmental matters relevant to the extended period of operation requested by the applicant. Safety matters related to aging are outside the scope of this environmental review. An NRC safety review for the license renewal period is conducted separately. The comments provide no new information and will not be evaluated further in the context of the environmental review. However, the comments will be forwarded to the project manager for the license renewal safety review for consideration.

Need for Power

Comment: This past year we generated over 18 million megawatt hours of electricity. That was a record for us. That is enough to supply the power supplies of three million homes. (PBS-C-1)

Comment: For the future of electrical generation as the need for power climbs, the value of Peach Bottom as an electricity supplier shall rise proportionately. (PBS-H-5)

Comment: Terry Peck mentioned the situation as far as the energy policy of this country. And I think it is dramatic that nuclear energy is an important -- and let me repeat that -- an important ingredient of the national energy policy as we go forward. (PBS-I-8)

Comment: But industry's own reports say as high as 44 percent of the electricity needs in this country could be eliminated cost-effectively without affecting quality of life. And that definitely needs to be looked at. (PBS-M-15)

Comment: A reliable source of energy has been an important factor in the continued growth of York County. (PBS-AJ-2)

Response: The comments are noted. The Commission has determined that the NRC does not have a role in energy planning decision-making for existing plants, and the need for power is outside scope of license renewal as set forth in 10 CFR Part 51 and Part 54 of the Commission's regulations. The comments provide no new information for license renewal and, therefore, will not be evaluated further.

Cost of Power

Comment: We are cost competitive. Peach Bottom generates electricity at a cost that is cheaper than any fossil competition. And there isn't any kind of fossil plant -- coal, oil, or gas -- that can generate electricity cheaper than Peach Bottom. (PBS-C-3)

Comment: So all this type of work, and what contribute as a team, working together, was that you brought a dramatic cost decrease in nuclear power over those years, I mean, to where it is probably the most efficient of cost of energy cost today as compared to a lot of the other -- the other uses that we may take place. (PBS-I-6)

Comment: I think that is something that needs to go on the record here. We also need to look at the costs. We have heard tonight from some utility reps that these plants are cheap to operate. If that is the case, I am wondering if they would be willing to eliminate the stranded costs that are attached to my utility bill as an Exelon customer, because this is part of the bailout for these nuclear power plants. (PBS-O-3)

Comment: And so I question the statement that that power plant is creating low-cost energy for the residents of this locale. (PBS-R-2)

Comment: The second sentence just absolutely floors me and I would like it fully explained and justified in your environmental impact statement. It states, "A 40-year license term was selected on the basis of economic and antitrust considerations, not technical limitations." (PBS-T-5)

Comment: But there is a hidden cost in making the energy because there is the risk that is assumed by people in that thousand square miles around every power plant. (PBS-U-5)

Comment: According to the NRC, the decision to initially license Peach Bottom was based solely on economics, not safety or environmental factors. (PBS-Z-5)

Comment: Reading an account of the recent NRC environmental scoping meeting, I was reminded of an issue raised regarding relicensing: "stranded costs" (of nuclear power). As it was explained that the original license term (40 years) was based on economic concerns, it is obviously not unprecedented for the NRC to consider economic issues under the scope of its evaluation of a plant's environmental impact. Please consider this a request to do so again with specific attention to "stranded costs." (PBS-AD-1)

Response: The comments are noted. The economic costs and benefits of renewing an operating license are specifically directed in 10 CFR 51.95(c)(2) to be outside the scope of license renewal. The comments provide no new information and, therefore, will not be evaluated further.

Other Issues

Comment: Also, I would like to have material placed in the Salanco Library, which is in Quarryville, so that we can have access to that because it is kind of a long drive to come over here to York County. (PBS-P-11)

Comment: I kind of feel that Lancaster County is the lost stepchild in considerations and I, too, would reiterate that I believe that the library in Quarryville, which is within the 10-mile area, should have copies of the documents. (PBS-U-1)

Response: The comment is noted. The NRC staff made a telephone inquiry, and on November 20, 2001, visited the Salanco Library in Quarryville. The library staff agreed to provide shelf space for reference material related to the PBAPS license renewal environmental review, including the licensee's Environmental Report.

Comment: I hope we will have a public meeting in Lancaster County because the prevailing winds are westerly, and so any radioactive release would probably go over to Lancaster County. (PBS-P-9)

Response: The comment is noted. The NRC makes a reasonable effort to conduct its environmental public meetings in the vicinity of the plant to provide opportunities for public input. Interested parties that are unable to attend the public meeting may provide comments by letter or by email. The comment provides no new information and will not be evaluated further.

Summary

The preparation of the plant-specific SEIS for PBAPS, will take into account all the relevant environmental issues raised during the scoping process that are described above. The draft SEIS will be made available for public comment. Interested Federal, State, and local government agencies, local organizations, and members of the public will be given the opportunity to provide comments to be considered during the development of the final SEIS. Concerns identified that are outside the scope of the staff's environmental review have been or will be forwarded to the appropriate NRC program manager for consideration.