

FAX TRANSMITTAL

Attention: Dr. Mike Masnik
fax: 301-415-3061

From: Mark P. Oncavage
fax: 305-251-4651

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Subject: Scoping Comments, St. Lucie license renewal DSEIS

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The Florida Chapter

Chief, Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission

May 20, 2002

Dear Sir:

The Florida Chapter of the Sierra Club submits the following comments for the scoping of the Supplemental Environmental Impact Statement for the St. Lucie Nuclear Reactor license renewal proceedings. The Florida Chapter consists of 30,000 members and 17 regional groups.

1. Bifurcated Process. The public's right to participate in evidentiary safety hearings under 10 CFR 2.714 is compromised before the draft SEIS is published. This reverse process undermines both public confidence and public safety in that evidentiary hearings with public participation are usually disallowed without the benefits of a draft SEIS being published. The unmistakable message from the NRC is that the public is not a stakeholder in the safety portion of the relicensing procedures. The draft SEIS and the draft Safety Evaluation Report need to be published before public participation can be dismissed and evidentiary safety hearings disallowed. The letter and the spirit of the National Environmental Policy Act are being violated by the NRC with bifurcated relicensing procedures.

2. Terrorism. The draft SEIS needs to examine the procedures and facilities for stopping an aircraft of any size from being intentionally crashed into nuclear reactors, control rooms and spent fuel pools, as witnessed by the total destruction of the World Trade Center towers. If procedures and facilities are not overwhelmingly reassuring, then the draft SEIS needs to conclude that an intentional air crash is likely and all mitigation strategies need to be studied.

3. Truck Bombs. The draft SEIS needs to examine the procedures and facilities for stopping the detonation of a truck bomb at the plant site, at least the size of the truck bomb that destroyed the Murrah Federal Building in Oklahoma City. If procedures and facilities are not overwhelmingly reassuring, then the draft SEIS needs to conclude that a truck bomb detonation is likely and all mitigation strategies need to be studied.

4. Sabotage. The draft SEIS needs to examine nuclear plant personnel as well as procedures and facilities for stopping an armed attack of terrorists who intend to damage nuclear fuel from the reactor or the spent fuel pools. Mock attacks testing the security measures of nuclear plants have been unrealistically constrained.

A. The test limits the mock attack to a small number of intruders being aided by only one insider. Realistically, there are situations where dozens of minimally screened temporary workers are on site and two or more insider terrorists may be authorized to be inside the restricted area.

B. The test limits the insider to a passive function, which means the insider can only provide information to the terrorist intruders, not participate. This is a naïve and dangerous limitation. The insider(s) can easily become armed and actively participate.

C. The test limits the attack to times of normal operation when multiple layers of reactor safety systems are in place. During outages there may be only a single reactor safety layer that is operational. The reactor may be much more vulnerable to failure if mock attacks or real attacks occur during times of operational shutdown.

D. The tests are limited only to attacks on nuclear fuel in the reactor. No mock attacks have tested the security of nuclear fuel in the spent fuel pools which, potentially, is equally dangerous to the health and safety of the public. Spent fuel pools may be viewed by terrorists as softer targets.

E. The tests have excluded nuclear plants that are permanently shut down yet still contain large amounts of nuclear fuel in the spent fuel pools. Apparently, these facilities have far less security yet are equally as dangerous to the health and safety of the public as operating plants.

The procedures used in the mock attacks are not reassuring. The draft SEIS needs to study and evaluate all the additional security measures that may be needed to prevent a terrorist sabotage attack.

5. Lax Security Measures. The NRC conducted mock attacks on nuclear plants from 1991 to 1998 with unrealistic limits placed on the mock attackers (noted in section 4). During this time 57 of the 68 nuclear plant sites were tested. In 27 of 57 mock attacks (47%), the attackers were successful. This massive failure of nuclear plant security demonstrates the inability of the NRC to adequately protect the health and safety of the public. The draft SEIS needs to study and evaluate all of the measures which may be needed to rigorously strengthen the poor record of nuclear plant security. Lest we forget, America is at war with international terrorism.

6. Plant Emissions. The Generic EIS for License Renewal of Nuclear Plants, NUREG-1437, fails to list the isotopes and isotopic concentrations for radioactive pollution released to the public in airborne and waterborne waste streams for St. Lucie units 1 & 2. The draft SEIS needs to list this information for each of the previous 10 years and project radioactive pollution amounts for the 20 years of license extension.

7. Obsolete Data, Obsolete Conclusions. Since the GEIS was completed in April, 1996, the calculated exposure rates and the calculated adverse health effects have become woefully outdated. At a public meeting sponsored by the NRC in Homestead, Florida, it was stated by a

member of the NRC staff that the work on the GEIS began in 1992. The date of April 1996 for manuscript completion gives no assurance that the data and calculations were even current as of April 1996. The failing steam generator barrier between the primary coolant and the secondary coolant at St. Lucie may be responsible for radioactive emissions and adverse health effects far greater than the averages given in the GEIS. The SEIS needs to explain whether this barrier will continue to deteriorate and what will be the resultant consequences to the community.

All studies on radiation health effects completed since April 1996 are being ignored. The draft SEIS needs to publish accurate historical data on St. Lucie radioactive emissions, year by year, isotope by isotope. This would give independent scientists as well as industry scientists an opportunity to use current data and calculations to improve the accuracy of findings of the outdated GEIS in time to be included in the final SEIS. By hiding this data from the public, the NRC fosters the perception that publishing isotopic emissions data is something to be feared and avoided at all costs.

8. Davis-Besse. The surprising consequences of the boric acid leak at the Davis-Besse reactor demonstrates an accident causing mechanism previously unrecognized by the NRC in its severity. The SEIS needs to examine the possibility of the Davis-Besse failure and its variations before extending the operating license of St. Lucie by 20 years. Will boric acid exposure always corrode carbon steel? Can cracked control rod tube guides cause extensive corrosion even if boron crystals do not appear on the reactor lid? Can cracked instrument rod ports cause extensive corrosion even if boron crystals do not appear on the reactor lid? Can any opening in the stainless steel lining of the reactor cause corrosion from boric acid exposure? Does this corrosive mechanism affect welding material as well as carbon steel? Are all locations in the primary coolant loop, where carbon steel is exposed to boric acid, subject to corrosion? Are there circumstances where boric acid corrosion can increase the chances or magnify the severity of a pressurized thermal shock accident? Should the reactor vessels and primary coolant pipes be x-rayed for corrosion cavities? What would be the consequences of a corrosion related reactor failure at the St. Lucie plant site?

Please mail a copy of the St. Lucie DSEIS to:

Ms Arlene Sweeting
Chapter Conservation Chair
101 42nd Street, NW
Bradenton, FL 34209

Respectfully submitted,



Mark P. Oncavage
Florida Chapter Energy Committee