

## **Appendix A**

### **Comments Received on the Environmental Review**

## Appendix A

### Comments Received on the Environmental Review

#### Part I - Comments Received During Scoping

On September 24, 2001, the U.S. Nuclear Regulatory Commission (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 Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS), NUREG-1437, Volumes 1 and 2, to support the renewal application for the Peach Bottom operating licenses and to conduct scoping. This plant-specific supplement to the GEIS has been prepared in accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality (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 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 Delta, Pennsylvania on November 7, 2001. Approximately 70 members of the public attended the meetings. Each session began with NRC staff members providing brief overviews of the license renewal process and the NEPA process. After the NRC's prepared statements, the meetings were opened for public comments. Twenty-one attendees provided either oral statements that were recorded and transcribed by a certified court reporter or written statements. The meeting transcripts are an attachment to the Peach Bottom Public Meeting Summary Report dated January 18, 2002. The Public Electronic Reading Room (ADAMS) accession number for the summary report is ML020180346. (This accession number is provided to facilitate access to the document through ADAMS at <http://www.nrc.gov/reading-rm.html>) In addition to the comments provided during the public meetings, six comment letters, six e-mail messages, and two documents were received by the NRC in response to the Notice of Intent.

At the conclusion of the scoping period, the NRC staff and its contractors reviewed the transcripts and all written material received to identify specific comments and issues. Each set of comments from an individual was given a unique identifier (Commenter ID), so that the comments could be traced back to the original transcript, letter, or e-mail containing the comment. Specific comments were numbered sequentially within each comment set. Several commenters submitted more than one set of comments (e.g., they made statements in both the afternoon and evening scoping meetings). In these cases, there is a unique Commenter ID for each set of comments.

## Appendix A

1 Table A.1 identifies the individuals who provided comments applicable to the environmental  
2 review and gives the Commenter ID associated with each set of comments. Individuals who  
3 spoke at the scoping meetings are listed in the order in which they spoke at the public meeting,  
4 and individuals who provided comments by letter or e-mail are listed in alphabetical order. To  
5 maintain consistency with the scoping summary report, (Peach Bottom Environmental Scoping  
6 Summary Report, dated April 19, 2002), the unique identifier used in that report for each set of  
7 comments is retained in this appendix.  
8

**Table A.1.** Individuals Providing Comments During Scoping Comment Period

	<b>Commenters ID</b>	<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>
5	PBS-A	Christopher Reilly	York County	Afternoon Scoping Meeting
6	PBS-B	Kay Carman	York County	Afternoon Scoping Meeting
7	PBS-C	Jay Doering	Exelon	Afternoon Scoping Meeting
8	PBS-D	Fred Polaski	Exelon	Afternoon Scoping Meeting
9	PBS-E	Salvatore Ferranti		Afternoon Scoping Meeting
10	PBS-F	Bill Doward	Sheetmetal Workers Union Local 19	Afternoon Scoping Meeting
11	PBS-G	John Tucker		Afternoon Scoping Meeting
12	PBS-H	Terry Peck	Plumbers and Pipefitters Union Local 520	Afternoon Scoping Meeting
13	PBS-I	William Faraly, Jr.	Sheetmetal Workers Union Local 19	Afternoon Scoping Meeting
14	PBS-J	Sam McConnell		Evening Scoping Meeting
15	PBS-K	Jay Doering	Exelon	Evening Scoping Meeting
16	PBS-L	Fred Polaski	Exelon	Evening Scoping Meeting
17	PBS-M	Mike Ewall		Evening Scoping Meeting
18	PBS-N	Tracy Confer		Evening Scoping Meeting
19	PBS-O	Kip Adams		Evening Scoping Meeting
20	PBS-P	Ernie Guyll		Evening Scoping Meeting
21	PBS-Q	Richard King		Evening Scoping Meeting
22	PBS-R	Laura Jacobson		Evening Scoping Meeting
23	PBS-S	Jane Lee		Evening Scoping Meeting
24	PBS-T	Mary Osborn		Evening Scoping Meeting
25	PBS-U	William Coble		Evening Scoping Meeting
26	PBS-V	Jeff Griffith		Evening Scoping Meeting
27	PBS-W	Amy Donohue		Evening Scoping Meeting
28	PBS-X	George Crocker	North American Water Office	Email - Letter ML020110480)
29	PBS-Y	Dr. Lewis Cuthbert	The Alliance for a Clean Environment	Faxed Letter (ML020020383)
30	PBS-Z	Amy Donohue		Letter (ML013460258)
31	PBS-AA	Mike Ewall	Energy Justice Network	Flyer (ML020170483)

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**Table A.1. (contd)**

<b>Commenters ID</b>	<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>
PBS-AB	Thomas H. Gehr		Email – Letter ML020230264
PBS-AC	Dr. Jay M. Gould	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	Letter (ML013650064)

Specific comments were categorized and consolidated by topic. Comments with similar specific objectives were combined to capture the common essential issues raised by the commenters. The comments fall into one of several general groups. These groups include

- Specific comments that address environmental issues within the purview of the NRC environmental regulations related to license renewal. These comments address Category 1 or Category 2 issues or issues that were not addressed in the GEIS. They also address alternatives and related federal actions.
- General comments (1) in support of or opposed to nuclear power or license renewal or (2) on the license renewal process, the NRC's regulations, and the regulatory process. These comments may or may not be specifically related to the Peach Bottom license renewal application.
- Questions that do not provide new information.

- 1 • Specific comments that address issues that do not fall the within or are specifically  
2 excluded from the purview of NRC environmental regulations. These comments  
3 typically address issues such as the need for power, emergency preparedness, current  
4 operational safety issues, and safety issues related to operation during the renewal  
5 period.  
6

7 Each comment applicable to this environmental review and the NRC staff responses are  
8 summarized in this appendix. This information, was extracted from the Peach Bottom  
9 Environmental Scoping Summary Report, and is provided for the convenience of those  
10 interested in the scoping comments applicable to this environmental review. The comments that  
11 are general or outside the scope of the environmental review for Peach Bottom are not included  
12 here. More detail regarding the disposition of general or nonapplicable comments can be found  
13 in the Environmental Summary Report.  
14

15 The following pages summarize the comments and suggestions received as part of the scoping  
16 process that are applicable to this environmental review, and discuss the disposition of the  
17 comments and suggestions. The parenthetical alpha-numeric identifier after each comment  
18 refers to the comment set (Commenter ID) and the comment number.  
19

20 Comments in this section are grouped in the following categories:  
21

- 22 (1) Comments Concerning Category 1 Human Health Issues  
23 (2) Comments Concerning Category 2 Socioeconomic Issues  
24 (3) Comments Concerning Category 2 Aquatic Ecology Issues  
25 (4) Comments Concerning Alternatives  
26 (5) Comments Concerning Category 1 Postulated Accident Issues  
27  
28

1 **Comments**

2  
3 **1. Comments Concerning Category 1 Human Health Issues**

4  
5 As stated in 10 CFR Part 51, Table B-1, Category 1 human health issues include:

- 6 ● Radiation exposure to the public during refurbishment
- 7 ● Occupational radiation exposure during refurbishment
- 8 ● Microbiological organisms (occupational health)
- 9 ● Noise
- 10 ● Radiation exposures to public (license renewal term)
- 11 ● Occupational radiation exposures (license renewal term)

12  
13 **Comment:** We are also finding higher incidents of thyroid and breast cancers in nuclear reactor  
14 communities, including in the tri-county area around here. (PBS-M-9)

15  
16 **Comment:** I would submit that an environmental impact statement ought to include human  
17 population as part of the scope. (PBS-N-1)

18  
19 **Comment:** I would also suggest that since Peach Bottom is so close to Limerick, Three Mile  
20 Island, and not terribly far from Salem, that the impacts of Peach Bottom should be considered  
21 in conjunction with the cumulative impacts of all those three reactors combined. I would even  
22 extend that as far as a 100-mile radius for my own comfort. (PBS-N-2)

23  
24 **Comment:** Some of the numbers that they have compiled indicate that thyroid cancer increased  
25 considerably after Units 2 and 3 started operation. The number they came up with is that it  
26 increased 49 percent. (PBS-N-3)

27  
28 **Comment:** In short, I would like to submit that the scope should include non-cancer health  
29 effects in the human population, that it should include cumulative impacts from other reactors  
30 over a 100-mile radius. (PBS-N-4)

31  
32 **Comment:** My father died of cancer about 16 years ago and he lived a very healthy lifestyle, I  
33 believe. He had smoked but he stopped about 23 years before he died. The only unhealthy  
34 thing he might have done is, he spent a lot of time outside. (PBS-P-2)

35  
36 **Comment:** And one thing I would like as far as the environmental study is to know the number  
37 of those radioactive releases and how much radiation was released. (PBS-P-4)

38  
39 **Comment:** I would also like as part of the environmental study data on the cancer deaths, birth  
40 defects and stillbirths in a 10-mile radius of the Peach Bottom Power plant and how that  
41 compares with the national average. (PBS-P-5)

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

3 **Comment:** Something even more troubling is the release of tritium and tritium is a nuclide  
4 generated out of the process of nuclear power plants. Tritium is part water and it cannot be  
5 filtered and therefore, it goes into the river. Down river anybody who is drinking that water is  
6 drinking tritiated water. (PBS-S-1)

7  
8 **Comment:** The steam that is released into the atmosphere is also tritiated so that when it drifts  
9 downwind from where you live, you are inhaling tritium. (PBS-S-2)

10  
11 **Comment:** We have learned that cancer deaths near the Peach Bottom plant rose in Lancaster  
12 and York Counties after Units 2 and 3 began operations.

- 13
- 14 ● Increases were noted in radiation-sensitive cancers, including leukemia, breast,  
15 thyroid, bone and joint, Hodgkin's disease, and multiple myeloma.
- 16
- 17 ● The number of women diagnosed with breast cancer in Chester, Lancaster, and  
18 York Counties nearly doubled between 1985 and 1998.
- 19
- 20 ● Thyroid cancer in the three counties jumped from 26 to 110 between 1985 and  
21 1998. The current rate is 28% above the rate for the U.S. Thyroid cancer is  
22 considered one of the more radiation-sensitive cancers. (PBS-Y-1)
- 23

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

- 27
- 28 ● Pottstown residents ingests airborne particles (either breathed or from the local  
29 municipal water) routinely escaping from Peach Bottom.
- 30
- 31 ● The Pottstown area gets much of its milk from dairies located in Lancaster and  
32 York Counties, near Peach Bottom. Residents, both near Peach Bottom and  
33 elsewhere like Pottstown, ingest Peach Bottom fallout in milk. (PBS-Y-3)
- 34

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

38  
39 **Comment:** Plutonium is biologically and chemically attracted to bone. It clumps on the surface  
40 of the bone, delivering a concentrated dose of radiation to surrounding cells. Radioactive  
41 strontium lodges in bone and remains there for a lifetime, constantly irradiating the surrounding  
42 cells. (PBS-Z-9)

43  
44 **Comment:** It's pretty common knowledge that radiation causes cancer and death. What isn't  
45 common knowledge is the other effects it can have on the human population, which we may

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1 already be experiencing without seeing the connection to radiation. R. M. Sievert, famous  
2 radiologist, told an international meeting in 1950, "There is no known tolerance for radiation."  
3 Death by slow poison is as unacceptable as death by catastrophic accident. There is no safe  
4 exposure to ionizing radiation. (PBS-Z-10)  
5

6 **Comment:** Fission products may be called 'background radiation' when they do not emanate  
7 from the installation under consideration, or when they have been in the environment for a year  
8 or more. Thus, when two nuclear power plants on the same land are licensed separately (such  
9 as Peach Bottom), the pollution from one is considered 'background radiation' while  
10 contamination from the other is being considered. Plus, last year's pollution from the reactor  
11 becomes 'background' after persisting in the environment longer than a year. An individual's  
12 yearly radiation exposure estimate attributable to nuclear activities is an assessment of a fresh  
13 fission dose from a particular source -- not a realistic measure of total dose from all sources,  
14 whether external -- left over from last year's pollution or already incorporated into body tissue  
15 from previous ingested or inhaled radionuclides, continuing to give small doses of radiation all  
16 the time. It is also misleading to report pollution in terms of a percentage increase in  
17 'background radiation' levels. Little or nothing is said about the steady increase in background  
18 radiation due to human activities. Hence, a percentage of 'background radiation' added may  
19 stay constant, masking the total accumulation. (PBS-Z-12)  
20

21 **Comment:** Government regulations allow radioactive water to be released into the environment,  
22 containing "permissible" levels of contamination. "Permissible" does not mean safe.  
23 (PBS-Z-17)  
24

25 **Comment:** Do operations of reactors, which routinely emit man-made chemicals into the air that  
26 are inhaled and ingested in diet, result in increased disease risk, including cancer? (PBS-AC-1)  
27

28 **Comment:** Overall, the local cancer rate jumped from 3% below the U.S. rate to 2% above.  
29 This may appear to be a small increase, but in the 10-year period 1975-84, over 600 additional  
30 cancer deaths occurred in Lancaster and York Counties. Perhaps most telling about the NCI  
31 data is that rates for almost all cancers most sensitive to the damaging effects of radiation  
32 increased. For example, humans exposed to radiation from nuclear reactors have an increased  
33 risk of thyroid cancer, due to the presence of thyroid-damaging iodine in reactor emissions.  
34 Thyroid cancer deaths were 14% below the U.S. before 1975, but jumped to 28% above after  
35 the reactors opened. The same occurred for bone and joint cancer, and multiple myeloma  
36 (bone marrow cancer), sensitive to bone-seeking radioactive chemicals such as strontium and  
37 barium (see below). The local breast cancer death rate increased significantly. A final indicator  
38 that Peach Bottom releases contributed to unusually high cancer rates was the rise in cancer  
39 deaths among children under age 10 living in Lancaster and York counties. Children are most  
40 susceptible to diseases caused by environmental pollutants such as nuclear power plant  
41 emissions. (PBS-AC-11)  
42

43 **Comment:** In 1985, the Pennsylvania Health Department began to collect cancer cases (as  
44 opposed to deaths) for the first time. Their files are complete throughout 1998. During that  
45 period, the total number of cancer cases rose 48%, from 4280 to 6313. During the same period,

1 the number of new breast cancer cases diagnosed in women nearly doubled, from 609 to 1135.  
2 Over half of this increase took place in the most recent four years (1994-98), making the issue a  
3 current one (see below). The number of thyroid cancer cases jumped from 26 to 110 from 1985  
4 to 1998 (see below). Again, the large increase from 1994 to 1998 (72 to 110) makes thyroid  
5 cancer a present concern. (PBS-AC-12)

6  
7 **Comment:** Current (1998) local rates of all cancers, breast cancer, and thyroid cancer exceed  
8 the U.S. average, by 7.3%, 19.9%, and 28.3%, respectively. (PBS-AC-13)

9  
10 **Response:** The comments are noted. To the extent that these comments question the  
11 radiological protection afforded by NRC regulations, radiation doses to the public during the  
12 license renewal term are a Category 1 issue as evaluated in the GEIS. Doses to members of  
13 the public from Peach Bottom Units 2 and 3 emissions were specifically evaluated in Section 4.6  
14 of the GEIS, using data from monitored emissions and ambient monitoring, and were found to  
15 be well within regulatory limits. The evaluation of health effects of radiation, both natural and  
16 man-made, is an ongoing activity involving public, private, and international institutions. The  
17 assessment of health effects upon which the GEIS analysis is based was founded on the  
18 consensus of these sources. No changes in that consensus have occurred since the GEIS was  
19 completed. The comments will not be evaluated further.

20  
21 **Comment:** Now, in human health aspects we need to include the current research on things  
22 like a strontium-90 disposition in baby teeth like the Tooth Fairy Project folks have been doing.  
23 (PBS-M-7)

24  
25 **Comment:** I know the government stopped looking at that, on the strontium-90 impacts in the  
26 milk supply and in humans after many years. But the amount that is being found in this private  
27 research recently is as high as was found in the atmospheric bomb testing in the '40's and 50's.  
28 And so this is definitely something that needs to be included in the environmental impact  
29 statement as well as looking at other epidemiological studies on things like infant mortality where  
30 they are finding infant mortality dropping in communities around nuclear reactors after they have  
31 closed. (PBS-M-8)

32  
33 **Comment:** Health Studies Are Lacking. There has been a dearth of scientific, peer-reviewed  
34 studies evaluating disease rates near U.S. nuclear power plants since the first reactor began  
35 operations in 1957. Only one national study has been done. In 1990, at the insistence of  
36 Senator Edward M. Kennedy, the National Cancer Institute published data on cancer near  
37 nuclear plants. While the study concluded that there was no connection between radioactive  
38 emissions and cancer deaths, rates near many reactors rose after reactor startup. Since 1990,  
39 no federal agency, including the Environmental Protection Agency and Nuclear Regulatory  
40 Commission, has undertaken any studies of disease rates near nuclear plants. (PBS-AC-5)

41  
42 **Comment:** In-Body Measurements Are Lacking. The lack of health studies near American  
43 nuclear reactors is complemented by a lack of measurements of in-body levels of radioactivity  
44 for persons living near nuclear reactors. Government-supported programs to measure  
45 Strontium-90 in St. Louis baby teeth (4) and in New York City and San Francisco bones (5) were

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1 terminated in 1970 and 1982, respectively. Both measured the effects of bomb test fallout rather  
2 than nuclear power reactor emissions. (PBS-AC-6)  
3

4 **Comment:** Of all man-made radioactive chemicals, Sr-90 was the one that caused the greatest  
5 health concern during the atmospheric bomb test years in the 1950s and 1960s. (PBS-AC-7)  
6

7 **Comment:** Link Between Sr-90 in Teeth and Childhood Cancer -- Long Island. The largest  
8 number of teeth (563) have been measured for residents of Suffolk County New York, site of the  
9 Brookhaven National Lab and surrounded by nearby reactors. Results show that the average  
10 level of Sr-90 has steadily increased 40.0% from the early 1980s to the mid-1990s. Because  
11 U.S. above-ground bomb testing ceased in the early 1960s, and old bomb fallout is decaying  
12 steadily, this trend indicates that a current source of radioactive emissions is contributing to the  
13 buildup of Sr-90 in teeth. This source can only be nuclear reactors. During the same time  
14 period, the rate of cancer diagnosed in Suffolk County children less than 10 years old steadily  
15 rose a nearly identical 48.9% (10). The data support the theory that exposure to radioactivity  
16 increases the risk of cancer, especially in young persons. (PBS-AC-8)  
17

18 **Comment:** Strontium-90 in Baby Teeth. While the majority of teeth have been received from  
19 California, Florida, New Jersey, and New York, 33 are from children born after 1979 in  
20 southeastern Pennsylvania or in Maryland. (After 1979, virtually all strontium-90 in baby teeth  
21 was generated from nuclear reactors, rather than atomic bomb test fallout left over from the  
22 early 1960s). The average Sr-90 concentration in these teeth is higher than any of the four  
23 states with large numbers of teeth (CA, FL, NJ, and NY), and more than 60% greater than the  
24 national average. Virtually all of these 33 teeth are from persons living within 55 miles of Peach  
25 Bottom. (PBS-AC-10)  
26

27 **Comment:** These developments indicate that efforts to protect humans from the potentially  
28 harmful effects of exposure to radioactive emissions in the environment will be critical.  
29 (PBS-AC-15)  
30

31 **Response:** The comments are noted. The staff considers the interest in Sr-90 in baby teeth to  
32 be within the scope of this license renewal environmental review, and will discuss the results of  
33 its assessment of the issue for the Peach Bottom license renewal in Chapter 4 of the SEIS.  
34

35 **2. Comments Concerning Category 2 Socioeconomic Issues**  
36

37 As stated in 10 CFR Part 51, Table B-1, Category 2 socioeconomic issues are:  
38

- 39 ● Housing
- 40 ● Public services: public utilities
- 41 ● Public services, education (refurbishment)
- 42 ● Offsite land use (refurbishment)
- 43 ● Offsite land use (license renewal term)
- 44 ● Public services, transportation
- 45 ● Historic and archaeological resources.

1 **Comment:** The plant provides hundreds of local and regional residents good-paying jobs.  
2 (PBS-A-1)  
3

4 **Comment:** For example, the county-affiliated Delta Senior Center has received thousands of  
5 dollars in money and equipment from Exelon during my tenure as commissioner. (PBS-A-2)  
6

7 **Comment:** The county, school district and host municipality also derive significant tax revenue  
8 from the plant. (PBS-A-3)  
9

10 **Comment:** By extending Peach Bottom Atomic Power Station's operating license, the NRC will  
11 help ensure at least two more decades of growth, opportunity and prosperity in York County.  
12 (PBS-A-5)  
13

14 **Comment:** It means jobs for approximately 1000 people over that period of time. (PBS-C-5)  
15

16 **Comment:** It means a positive impact on the local economy, as covered by Chris: taxes and  
17 services, plant employees and their families living in the area. (PBS-C-6)  
18

19 **Comment:** It means support of the community. We get very much involved in community  
20 activities around the plant. Mason-Dixon Business Association, the Delta Peach Bottom  
21 Elementary School. We have a program going there called School Buddies where employees  
22 from the power plant team up with the teachers at the school and visit the school on a regular  
23 basis to talk to the students -- a very successful program not only for the students but I would  
24 say for the employees also. It really builds morale. (PBS-C-7)  
25

26 **Comment:** Thousands of dollars are contributed to the United Way by our employees at Peach  
27 Bottom. Hundreds of pints of blood go to the American Red Cross each year. There's little  
28 league coaches. There's PTA presidents. There's a lot of volunteer firemen. There's a lot of  
29 church leaders, all coming out of Peach Bottom. And that's an impact that we have on the plan.  
30 (PBS-C-8)  
31

32 **Comment:** And one of the reasons that my business is so successful is because of the  
33 business that Exelon or PECO brings into our community. Throughout the years, PECO has  
34 created a significant growth for my business because we cater their seminars, their training  
35 classes, their meetings. (PBS-E-1)  
36

37 **Comment:** And most of all, directly into this community PECO is creating an influx of people  
38 into the area from subcontractors, and there are even their own employees. And these people  
39 spend in the community. (PBS-E-2)  
40

41 **Comment:** Just like my business, I'm sure that other businesses, from local supermarkets and  
42 gas stations and other businesses in the community live in a great deal because of PECO.  
43 (PBS-E-3)  
44

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

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1 **Comment:** And third of all, PECO has also maintained great parks into our community. It  
2 donates to our fire department. It also donates to our local ambulance groups. (PBS-E-7)  
3

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

6 **Comment:** Most of the 371 members I have spoken about live in the York and Lancaster areas,  
7 more importantly depend on the safe and good-paying jobs that support their families and this  
8 community. (PBS-F-1)  
9

10 **Comment:** The Peach Bottom Power Plant has been a good economic factor with regard to  
11 construction and maintenance. (PBS-H-2)  
12

13 **Comment:** Wherever you go throughout this state or throughout the region, that this  
14 corporation has been -- they have always been based in the community, have helped the  
15 community, and they have always been support of the community and in essence part of the  
16 community. And although there are certain corporate profits that you go after because of being  
17 a business, you know, you can't take a side of those other aspects where they have been  
18 involved in the community. (PBS-I-4)  
19

20 **Comment:** We have a good working relationship with Exelon PECO as far as them donating  
21 money to the community for the fire company. (PBS-V-1)  
22

23 **Comment:** Just as critical, however, is the importance of Peach Bottom Atomic Power Station  
24 to York County. The plant provides hundreds of local and regional residents with good-paying  
25 jobs. But more importantly, Peach Bottom is an outstanding corporate citizen and neighbor.  
26 (PBS-AH-3)  
27

28 **Comment:** The York County Chamber of Commerce represents 2200 members who have  
29 directly or indirectly benefited from having the Peach Bottom Nuclear Power Plant operating in  
30 our county. We have confidence that Exelon Corp. will continue to invest in the facility and  
31 operate it with the highest safety standards. (PBS-AJ-3)  
32

33 **Response:** The comments are noted. Socioeconomic issues specific to the plant are  
34 Category 2 issues and will be addressed in Chapter 4 of the SEIS. The comments support  
35 license renewal at PBAPS.  
36

37 **Comment:** It is our opinion the relicensing of this facility, without some mitigation measures  
38 being employed to preserve and protect this historic property, will result in the continued  
39 deterioration of the portion of the Feeder Canal which was bisected by the transmission line  
40 (36 CFR 800.5)(b)(vi)). We suggest these mitigation measures should include: 1) the  
41 restoration of the depth and width of the Feeder Canal across the transmission line; 2) the  
42 construction of a simple bridge to permit vehicular access across the Feeder Canal for routine  
43 transmission line Right-of-Way maintenance; and 3) monitoring of the transmission line Right-of-  
44 Way to prevent uncontrolled crossing of the Feeder Canal by dirt bikes and ATVs and the repair  
45 of damage resulting from such uncontrolled crossing, if they do occur. (PBS-AK-1)

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

3  
4 **Comment:** Peach Bottom Nuclear Power Plant is located in a relatively low income, rural  
5 community without much political clout. This is environmental injustice. (PBS-Z-29)

6  
7 **Response:** The comment is noted. Environmental Justice will be addressed in Section 4.4 of  
8 the SEIS.

### 9 10 **3. Comments Concerning Category 2 Aquatic Ecology Issues**

11  
12 As stated in 10 CFR Part 51, Table B-1, Category 2 aquatic ecology issues are:

- 13
- 14 ● Entrainment of fish and shellfish in early life stages
- 15 ● Impingement of fish and shellfish
- 16 ● Heat shock

17  
18 **Comment:** We request that within the scope of the NRC's Environmental Assessment, as a  
19 Category 2 issue, the NRC conduct a thorough evaluation of the potential impact of license  
20 renewal for PBAPS on the restoration of migratory fishes to the Susquehanna River and  
21 Chesapeake Bay utilizing all relevant and current information. (PBS-AG-1)

22  
23 **Response:** The comment is noted. The comment relates to aquatic ecology issues and will be  
24 discussed in Chapters 2 and 4 of the SEIS.

25  
26 **Comment:** Have studies been conducted or will they be conducted to quantify the cumulative  
27 radioactive buildup in the Susquehanna River water, bed, or local area surface soil or aquifer?  
28 And additionally, if those studies have been made, have projections been made as to the  
29 extended plant life, what that will do to it, based on those studies? (PBS-J-1)

30  
31 **Comment:** I think you said you do study the effect of the wildlife in the Susquehanna River. It  
32 would be nice to have a study before the plant was built so we could have some sort of  
33 benchmark for that. (PBS-P-6)

34  
35 **Response:** The comments are noted. The comments relate to cumulative impact issues and  
36 will be discussed in Chapters 2 and 4 of the SEIS.

### 37 38 **4. Comments Concerning Alternatives**

39  
40 **Comment:** I would much rather see Peach Bottom continue to operate rather than other viable  
41 alternatives for electric power generation which are more polluting and actually more difficult to  
42 control the pollution. (PBS-J-5)

## Appendix A

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

6  
7 **Comment:** We also need to look at things like wind generation. (PBS-M-16)

8  
9 **Comment:** We also need to look at solar generation where KPMG, which is an international -- it  
10 is a very well-known auditing firm -- has actually done a report looking at what it would take to  
11 make solar power affordable, what it would take to get to the point where we don't have this  
12 trouble where people aren't willing to pay so much for it and that's why it is not cheap enough  
13 because they don't make enough of it. (PBS-M-17)

14  
15 **Comment:** And it should include alternative generation sources as in: What is the impact of  
16 keeping this reactor operational as opposed to, oh, say, building a bunch of wind turbines?  
17 (PBS-N-5)

18  
19 **Comment:** And I also believe that we should use renewable resources for energy and if  
20 necessary replace the Peach Bottom Power Plant, to shut it down and implement a  
21 decommissioning process. (PBS-P-12)

22  
23 **Comment:** There are alternative methods available to these companies that will produce power  
24 for the needs of our communities and for those outside of our area who also need power.  
25 (PBS-Q-4)

26  
27 **Comment:** So there surely must be a better way to generate electricity without slowly killing not  
28 just the human population or not just the animal population. (PBS-S-5)

29  
30 **Comment:** You certainly find another way generate electricity besides poisoning the population,  
31 destroying the land, destroying the animals, destroying the fish, destroying the drinking water.  
32 (PBS-S-7)

33  
34 **Comment:** For these reasons, I think we need to begin to look for alternate ways to make  
35 electricity and take this weapon out of the hands of our enemies. (PBS-U-4)

36  
37 **Comment:** If the real, honest reason for nuclear power is to create electricity, there are smarter,  
38 cleaner, safer and cheaper ways. (PBS-Z-33)

39  
40 **Comment:** Just imagine if we spent the money we currently spend mining uranium, splitting the  
41 atoms to make plutonium to create heat, to boil water to turn turbines making electricity and then  
42 cleaning up and storing the resulting radioactive wastes for millions of years -- if we took this  
43 money and instead used it for conservation, solar and wind, we'd probably still have some left  
44 over and no nuclear waste to worry about. Any other decision seems just plain stupid.  
45 (PBS-Z-34)

1  
2 **Comment:** Rather than further pillage our environment for more dirty power, we can start today  
3 with policies which promote conservation, efficiency and CLEAN renewables (like wind and  
4 solar) to replace our dirty and wasteful power system. (PBS-AA-1)  
5

6 **Comment:** Conservation and efficiency have a large potential to reduce our electricity needs.  
7 (PBS-AA-2)  
8

9 **Comment:** Solar power, if it were only affordable, has the power to fill the entire country's  
10 energy needs -- using existing rooftops and other already paved surfaces. (PBS-AA-3)  
11

12 **Comment:** Wind power, according to the U.S. Department of Energy, can provide more power  
13 than the entire nation's electricity needs. (PBS-AA-4)  
14

15 **Comment:** Alternative sources of energy need to be developed and the goal should be to  
16 strive to that end by 2014, and/or build more hydro-electric plants rather than renew a contract at  
17 an aging nuclear facility. (PBS-AB-2)  
18

19 **Comment:** Specifically, in the Peach Bottom supplemental EIS, the NRC should conduct a  
20 comprehensive analysis addressing costs and environmental impacts of available conservation  
21 technologies. Further, the NRC should sincerely and honestly consider the potential of those  
22 technologies and energy efficiencies as the preferred alternative to license renewal. (PBS-AE-4)  
23

24 **Response:** The comments are noted. Impacts from reasonable alternatives for the Peach  
25 Bottom license renewal will be evaluated in Section 8 of the SEIS.  
26

## 27 **5. Comments Concerning Category 1 Postulated Accident Issues**

28

29 As stated in 10 CFR Part 51, Subpart A, Appendix B, Table B-1, design basis accidents is the  
30 only Category 1 issue associated with postulated accidents. For severe accidents (i.e., beyond  
31 design basis accidents), the staff concluded that the probability-weighted environmental  
32 consequences from severe accidents are small for all plants, but that alternatives to mitigate  
33 severe accidents must be considered for all plants that have not considered such alternatives.  
34 See 10 CFR 51.53(c)(3)(ii)(L).  
35

36 **Comment:** There has been a lot of work done on these containments, but Mark 1  
37 containments, especially being smaller with lower design pressure and in spite of the  
38 suppression pool, if you look at the WASH-1400 reg safety study you will find something like a  
39 90-percent probability of that containment failing. (PBS-M-12)  
40

## Appendix A

1 **Comment:** Now, there have been some measures to address those concerns that NRC had.  
2 But we are still looking at the fact that the control room operators would have to make a decision  
3 in the case of an emergency core cooling system activation on whether or not to vent the  
4 containment in order to save it. And that is not something that should be seen as acceptable  
5 impact on the environment. (PBS-M-13)  
6

7 **Comment:** Another concern I have with the Peach Bottom Power Plant is the possibility of an  
8 earthquake causing a problem. And I know a lot of people kind of think that might be funny. But  
9 there is a fault line called the Martick Fault Line that runs about, I would say, less than 10 miles  
10 north of here. And if there is a major earthquake along that line, that could cause a lot of  
11 problems. (PBS-P-3)  
12

13 **Comment:** Martick Fault Line. [see comment PBS-P-3] (PBS-Q-3)  
14

15 **Comment:** According to a report by Sandia National Laboratories on November 1, 1982, called  
16 Calculation of Reactor Accident Consequences (CRAC-2), the "peak early deaths" from an  
17 accident at Peach Bottom are estimated at 72,000, with "peak early injuries" estimated at  
18 45,000. (PBS-Y-2)  
19

20 **Comment:** Pottstown would also be strongly affected by escaping downwind radiation in case  
21 of an accident at Peach Bottom caused by operators. If prevailing winds blow at about 10 miles  
22 per hour, harmful radiation would arrive in Pottstown in as little as 5 hours after the accident.  
23 (PBS-Y-4)  
24

25 **Comment:** Peach Bottom is a General Electric Boiling water reactor, an obsolete design that is  
26 no longer built or constructed, inferior to pressure water reactors. Peach Bottom's Mark I  
27 containment structure has been demonstrated by Sandia Laboratories to be likely to fail during a  
28 core melt accident (like Three Mile Island), allowing radiation to escape directly into the  
29 environment. This was corroborated by a February 1987 NRC study. Industry officials say the  
30 problem with Mark I is that it is too small and wasn't designed to withstand the pressure it is  
31 supposed to resist. In Feb. 1989, the NRC recommended plants using the Mark I shell to modify  
32 the structure to reduce the risk of failure during an accident. Clearly showing its arrogance and  
33 lack of concern for the safety and health of workers and citizens, PECO said it would only make  
34 the \$2-5 million changes if forced to do so. (PBS-Z-15)  
35

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

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**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.

**Part II - Comments Received on the Draft SEIS**

(Reserved for comments received on the draft SEIS.)