

## **Appendix A**

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

## Appendix A

### Comments Received on the Environmental Review

#### 1 **Part I – Comments Received During Scoping**

2  
3 On August 1, 2002, the Nuclear Regulatory Commission (NRC) received, by letter dated  
4 July 30, 2002, an application from the Rochester Gas and Electric Corporation (RG&E), filed  
5 pursuant to Section 104b of the Atomic Energy Act of 1954, as amended, and 10 CFR Part 54,  
6 which would authorize the applicant to operate the R. E. Ginna Nuclear Power Plant (Ginna) for  
7 an additional 20-year period. The current operating license (OL) for Ginna expires on  
8 September 18, 2009. Ginna is a pressurized water reactor designed by Westinghouse Electric  
9 Company and is located in Wayne County, New York. As part of the application, RG&E  
10 submitted an Environmental Report (ER) prepared in accordance with the requirements of 10  
11 CFR Part 51, which contains the NRC requirements for implementing the National  
12 Environmental Policy Act (NEPA) of 1969. Section 51.53 outlines requirements for preparation  
13 and submittal of ERs to the NRC.  
14

15 Section 51.53(c)(3) was based upon the findings documented in NUREG-1437, *Generic*  
16 *Environmental Impact Statement for License Renewal of Nuclear Power Plants*, (GEIS). The  
17 GEIS, in which the staff identified and evaluated the environmental impacts associated with  
18 license renewal, was issued for public comment. The staff received input from Federal and  
19 State agencies, public organizations, and private citizens. As a result of the assessments in the  
20 GEIS, a number of impacts were determined to be generic to all nuclear power plants. These  
21 were designated as Category 1 impacts. An applicant for license renewal may adopt the  
22 conclusions contained in the GEIS for Category 1 impacts in the absence of new and significant  
23 information that may cause the conclusions to fall outside those of the GEIS. Category 2  
24 impacts are those impacts that have been determined to be plant-specific and are required to  
25 be addressed in the applicant's ER.  
26

27 The Commission determined that the NRC does not have a role in energy planning decision-  
28 making for existing plants, which should be left to State regulators and utility officials.  
29 Therefore, an applicant for license renewal need not provide an analysis of the need for power,  
30 or the economic costs and economic benefits of the proposed action. Additionally, the  
31 Commission determined that the ER should not include a discussion of any aspect of storage of  
32 spent fuel for the facility. This determination was based on the Nuclear Waste Policy Act of  
33 1982 and the Commission's Waste Confidence Rule, 10 CFR 51.23.  
34

35 On October 10, 2002, the NRC published a Notice of Intent in the *Federal Register*  
36 (67 FR 63171), to notify the public of the NRC's intent to prepare a plant-specific supplement to  
37 the GEIS to support the review of the license renewal application for the Ginna OL. The

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1 plant-specific supplement to the GEIS will be prepared in accordance with the provisions of  
2 NEPA and 10 CFR Part 51. The NRC initiated the scoping process with the issuance of a  
3 *Federal Register* Notice. The NRC invited the applicant; Federal, Tribal, State, and local  
4 government agencies; local organizations; and individuals to participate in the scoping process  
5 by providing oral comments at the scheduled public meetings and/or submitting written  
6 suggestions and comments no later than December 11, 2002. The scoping process included  
7 two public scoping meetings, which were held at the Webster Public Library in Webster, New  
8 York, on November 6, 2002. The NRC announced the meetings in local newspapers  
9 (*Rochester Democrat and Chronicle*, *Courier Gazette*, *Times of Wayne County*, *Wayne County*  
10 *Star*, and *Finger Lake Times*), issued press releases, and distributed flyers locally.  
11 Approximately 120 people attended the meetings, including the NRC environmental review  
12 team, members of the public, representatives from RG&E, State and local governments, and  
13 the press. Both sessions began with NRC staff members providing a brief overview of the  
14 license renewal process and the NEPA process. Following the NRC's prepared statements, the  
15 meetings were open for public comments. Fifteen (15) commenters (two of whom spoke at  
16 both meetings) provided either oral comments or written statements that were recorded and  
17 transcribed by a certified court reporter. In addition to the comments provided during the public  
18 meetings, the NRC received four comment letters. The afternoon and evening meeting  
19 transcripts (accession numbers ML023530107 and ML023530120) and comment letters are  
20 available electronically for public inspection in the NRC Public Document Room or from the  
21 Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS  
22 is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm.htm> (the Public  
23 Electronic Reading Room).

24  
25 The scoping process provides an opportunity for public participation to identify issues to be  
26 addressed in the plant-specific supplement to the GEIS and highlight public concerns and  
27 issues. The Notice of Intent to prepare an EIS identified the following objectives of the scoping  
28 process:

- 29
- 30 • define the proposed action
- 31
- 32 • determine the scope of the supplement to the GEIS and identify significant issues to be  
33 analyzed in depth
- 34
- 35 • identify and eliminate peripheral issues
- 36
- 37 • identify any environmental assessments and other environmental impact statements  
38 being prepared that are related to the supplement to the GEIS
- 39
- 40 • identify other environmental review and consultation requirements
- 41

- 1 • indicate the schedule for preparation of the supplement to the GEIS
- 2 • identify any cooperating agencies
- 3
- 4 • describe how the supplement to the GEIS will be prepared.
- 5

6 At the conclusion of the scoping period, the NRC staff and its contractor reviewed the  
7 transcripts and all written material received, and identified individual comments. All comments  
8 and suggestions received orally during the scoping meetings or in writing were considered.  
9 Each set of comments from a given commenter was given a unique alpha identifier  
10 (Commenter ID letter), allowing each set of comments from a commenter to be traced back to  
11 the transcript, letter, or email in which the comments were submitted. Several commenters  
12 submitted comments through multiple sources (e.g., afternoon and evening scoping meetings).  
13 Table A-1 identifies the individuals providing comments and the Commenter ID letter associated  
14 with each person's set(s) of comments. The individuals are listed in the order in which they  
15 spoke at the public meeting, and random order for the comments received by letter or email.  
16

17 Comments were consolidated and categorized according to the topic within the proposed  
18 supplement to the GEIS or according to the general topic if outside the scope of the GEIS.  
19 Comments with similar specific objectives were combined to capture the common essential  
20 issues that had been raised in the source comments. Once comments were grouped according  
21 to subject area, the staff and contractor determined the appropriate action for the comment.  
22 The staff made a determination on each comment that it was one of the following:  
23

- 24 • A comment that was either related to support or opposition of license renewal in general  
25 (or specifically to Ginna) or that makes a general statement about the licensing renewal  
26 process. It may make only a general statement regarding Category 1 and/or Category 2  
27 issues. In addition, it provides no new information and does not pertain to 10 CFR  
28 Part 54.
- 29
- 30 • A comment about a Category 1 issue that
  - 31 - provided new information that required evaluation during the review
  - 32 - provided no new information.
  - 33
- 34 • A comment about a Category 2 issue that
  - 35 - provided information that required evaluation during the review
  - 36 - provided no such information.
  - 37
- 38 • A comment that raised an environmental issue that was not addressed in the GEIS.
- 39
- 40 • A comment regarding Alternatives to the proposed action.
- 41

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

<b>Commenter ID</b>	<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source and ADAMS Accession Number</b>
A	Bernadette Anderson		Afternoon Scoping Meeting <sup>(a)</sup>
B	Tim Judson	Citizens Awareness Network	Afternoon Scoping Meeting
C	John Greenbaum	Metro Justice	Afternoon Scoping Meeting
D	Andy Gutacker		Afternoon Scoping Meeting
E	Roland Micklem	Lakeshore Environmental Action	Afternoon Scoping Meeting
F	Michael Havens	Wayne Central School District	Afternoon Scoping Meeting
G	Bob Mecredy	RG&E	Afternoon Scoping Meeting
H	Susan Gateley	Lakeshore Environmental Action	Afternoon Scoping Meeting
I	Cathryn Thomas	Town of Webster	Afternoon Scoping Meeting
J	Ron Fellows	American Nuclear Society - Ginna Plant Branch	Afternoon Scoping Meeting
K	Joel Van Schaffel	Millwrights Local 1163	Afternoon Scoping Meeting
L	Ron Behan	Rochester Building and Construction Trades Council	Afternoon Scoping Meeting
M	Dr. N. R. Loomis		Afternoon Scoping Meeting
N	Charles Arnold		Evening Scoping Meeting <sup>(b)</sup>
O	Dick Clark	Town of Ontario	Evening Scoping Meeting
P	Bob Mecredy	RG&E	Evening Scoping Meeting
Q	Ron Fellows	American Nuclear Society-Ginna Plant Branch	Evening Scoping Meeting
R	Kimberly Merchant	New York State Department of Environmental Conservation	Comment Letter
S	Kathy Mitchell	Seneca Nation	Comment Letter
T	Tom Peaslee		Comment Letter
U	Frank Guelli	Town of Walworth	Comment Letter

(a) The afternoon transcript can be found under accession number ML023530107.

(b) The evening transcript can be found under accession number ML023530120.

- A comment regarding safety issues within the scope of 10 CFR Part 54, but out of the scope of 10 CFR Part 51.
- A comment outside the scope of license renewal (not related to 10 CFR Parts 51 or 54), which includes
  - a comment regarding emergency response and planning
  - a comment regarding the need for power
  - a comment regarding operational safety issues
  - a comment regarding safeguards and security.

- 1       • A comment that was actually a question and introduces no new information.  
2

3 Each comment is summarized in Appendix A, Part I. For reference, the unique identifier for  
4 each comment (Commenter ID letter listed in Table A-1 plus the comment number) is provided.  
5 In those cases where no new information was provided by the commenter, no further evaluation  
6 will be performed.  
7

8 The preparation of the plant-specific supplement to the GEIS (which is the SEIS) will take into  
9 account all the relevant issues raised during the scoping process. The SEIS will address both  
10 Category 1 and 2 issues, along with any new information identified as a result of scoping. The  
11 SEIS will rely on conclusions supported by information in the GEIS for Category 1 issues, and  
12 will include the analysis of Category 2 issues and any new and significant information. The  
13 draft plant-specific supplement to the GEIS will be available for public comment. The comment  
14 period will offer the next opportunity for the applicant; interested Federal, Tribal, State, and local  
15 government agencies; local organizations; and members of the public to provide input to the  
16 NRC's environmental review process. The comments received on the draft SEIS will be  
17 considered in the preparation of the final SEIS. The final SEIS, along with the staff's Safety  
18 Evaluation Report (SER), will provide much of the basis for the NRC's decision on the Ginna  
19 license renewal.  
20

21 Appendix A, Part I summarizes the comments and suggestions received as part of the scoping  
22 process, and discusses their disposition. Parenthetical numbers after each comment refer to  
23 the Commenter ID letter and the comment number. Comments can be tracked to the  
24 commenter and the source document through the ID letter and comment number listed in  
25 Table A-1. Comments are grouped by category. The categories are as follows:  
26

27 A.1.1 Comments Regarding License Renewal and its Processes  
28

29 A.1.2 Comments in Support of License Renewal at Ginna  
30

31 A.1.3 Comments in Opposition to License Renewal at Ginna  
32

33 A.1.4 Comments Concerning Aquatic Ecology Issues  
34

35 A.1.5 Comments Concerning Human Health  
36

37 A.1.6 Comments Concerning Socioeconomic Issues  
38

39 A.1.7 Comments Concerning Land Use Issues  
40

41 A.1.8 Comments Concerning Uranium Fuel Cycle and Waste Management Issues

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1 A.1.9 Comments Concerning Alternative Energy Sources

2  
3 A.1.10 Comments Concerning Safety Issues Within the Scope of License Renewal

### 4 5 **A.1 Comments and Responses**

#### 6 7 **A.1.1 Comments Regarding License Renewal and its Processes**

8  
9 **Comment:** But my other question is more in terms of the relicensing issue, and whether in  
10 your understanding, or any of the NRC representatives understanding, if Ginna is relicensed,  
11 whether that creates a larger window of opportunity for RG&E, or some other owner of Ginna,  
12 to build a new reactor, without having to go through a site permitting process? Sure, it is just a  
13 follow-up to my previous question. Because, you know, this is sort of a convoluted process that  
14 I feel that we are going through with the relicensing, as well as other regulatory issues. But I  
15 guess one of the things I'm wondering is, if Ginna were not to receive a license extension, then  
16 it would have to shut down in 2009. And prior to that, you know, initiate a decommissioning and  
17 site cleanup process, you know, through preparing plans for how they were going to do that,  
18 that they would have to submit to NRC and begin preparing, you know, the reactor complex and  
19 the site for that. And would that complicate, in any way, the submission of an early site permit  
20 application to build a new reactor onsite, or to begin that kind of preparation, has that ever  
21 happened before, and what is the anticipation? (B-3)

22  
23 **Response:** *The comment is in regard to license renewal and its processes in general. The*  
24 *Commission has established a process, by rule, for the environmental and safety reviews to be*  
25 *conducted to review a license renewal application. Any attempt to locate a new reactor on the*  
26 *existing site would require a new site permit as well as a new operating license completely*  
27 *separate from license renewal. The comment did not provide significant, new information;*  
28 *therefore, it will not be evaluated further.*

29  
30 **Comment:** And my question is, there are a number of nuclear power facilities on the New York  
31 side of Lake Ontario. Canada has 12. When you do the environmental impact statements do  
32 you then also take into consideration what is the impact of this conglomerate of plants that exist  
33 in this area? (A-4)

34  
35 **Comment:** And if Ginna were being considered, today, in this place, it might not be built under  
36 that legislation. Lake Ontario is now home to 16 nuclear plants, a tritium recovery facility, a  
37 uranium refinery, and at least two low-level radioactive waste dumps at Lewiston and Port  
38 Hope. Most of these plants were built after Ginna. Ginna is one of the oldest plants on the  
39 lake. That is a big cumulative impact on the lake. (H-3)

1 **Comment:** Also an environmental impact statement does, or should, consider what they call  
2 secondary impacts. Which are something like you build a shopping mall, and then you attract  
3 other businesses to set up alongside it, so that the initial traffic load from the mall becomes  
4 greater 20 years down the road because of other things. And that may be some of what Tim is  
5 driving at. By relicensing the plant you might encourage a future usage of that site, not  
6 necessarily another nuclear plant, but some other industrial usage of this slightly contaminated  
7 site that might not be compatible with the environment, or with the residential area. So I'm  
8 concerned about thinking about those secondary impacts, what this woman referred to, those  
9 20 year out impacts. (H-12)

10  
11 **Response:** *The comments are in regard to license renewal and its processes in general. The*  
12 *Commission has established a process, by rule, for the environmental and safety reviews to be*  
13 *conducted to review a license renewal application. This process includes a review of*  
14 *cumulative impacts. The comments did not provide significant, new information; therefore, they*  
15 *will not be evaluated further.*

16  
17 **Comment:** Another very big change since Ginna was built is deregulation. This is changing  
18 the way these plants are operated. Ginna is coming up on 40 years now. So it does need  
19 more care and monitoring. However, both the NRC and industry are trying to streamline  
20 regulation and reduce costs. Pressures to reduce costs to industry, along with possibly a little  
21 complacency, are what led to that hole in the reactor head at Davis-Besse. That could have  
22 been a very serious accident on Lake Erie. One more change since the good old days of the  
23 AEC, the regulatory Atomic Energy Commission of the 1960s. Today the NRC must function in  
24 a political environment that stresses deregulation and less government spending. The NRC  
25 has been like other agencies; it has been pressured to become more efficient. And for several  
26 years it has endured reduced funding, and a shortage of skilled technical workers. In a speech  
27 two years ago, I don't know what the situation is now, but two years ago the NRC chairman  
28 said, despite efforts to hire new engineers, we have experienced a net loss of engineers over  
29 the past five years, about 8 percent of their workforce, engineering workforce. We are losing  
30 expertise, and along with it, valuable institutional knowledge. That is a direct quote from his  
31 speech. The net effect of this, and failures to catch things like that Davis Besse hole in the  
32 head, is that there is less trust of institutions like the NRC, than there was of the AEC, 40 years  
33 ago. And I think we see a little bit of that in this room today, less trusting public. (H-8)

34  
35 **Response:** *The comment is in regard to license renewal and its processes in general. The*  
36 *Commission has established a process, by rule, for the environmental and safety reviews to be*  
37 *conducted to review a license renewal application. This includes an appropriate number of*  
38 *NRC and contractor staff to sufficiently review the plant and prepare a supplemental*  
39 *environmental impact statement specific to the plant. The comment did not provide significant,*  
40 *new information; therefore, it will not be evaluated further.*

41

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1 **Comment:** The THPO (Tribal Historic Preservation Office) would indeed be a consulting party  
2 to the renewal Ginna operating license. Under Section 106 of the NHPA (National Historic  
3 Preservation Act), the THPO has 30 days to respond to a notification of an undertaking.  
4 Unfortunately, your November 1 letter to us informed us of a public scoping meeting on  
5 November 6 - i.e., 5 days notice. Future consultation with us should occur on a government-to-  
6 government basis. The Seneca Nation, being a sovereign entity, will not be classified as the  
7 general public (see page 63172, bottom of left column of the Federal Register Notice of Intent).  
8 (S-1)

9  
10 **Response:** *The NRC recognizes the Seneca Nation as a sovereign entity and will conduct*  
11 *future consultation on a government-to-government basis. The comment did not provide*  
12 *significant, new information; therefore, it will not be evaluated further.*

### 13 14 **A.1.2 Comments in Support of License Renewal at Ginna**

15  
16 **Comment:** And let me say, with that, that provided that Energy East maintains the level of  
17 support for the Ginna Nuclear Power Plant, that has been demonstrated by RG&E, I am in  
18 support of relicensing the nuclear power plant. And I say that for three primary reasons. First  
19 of all, it has been an excellent corporate neighbor. Secondly, it provides a substantial tax base  
20 for the school district. And, thirdly, it provides a good standard of living for our families, and to  
21 my students. (F-1)

22  
23 **Comment:** The power plant has provided approximately \$15.8 million in revenue over the last  
24 five years. It provided \$3,182,172 to the tax base just last year; 29.9 percent of the local taxes  
25 that we collect come from Ginna. Consequently the loss of Ginna would be an economic  
26 disaster for the school district, and taxpayers. (F-2)

27  
28 **Comment:** Secondly, it has been a good corporate neighbor for us who live here in the Wayne  
29 Central School District. And I live approximately eight miles from the nuclear power plant. (F-3)

30  
31 **Comment:** I would also say that the plant has been a good neighbor. Mr. Bienenbach and  
32 his people have allowed us to use their Manor House for training; to house some of the  
33 programs for our special needs children. When we have a need RG&E has always been there.  
34 After 9/11, when all of us were very concerned about the safety of the plant, Rick Wyatts, Joe  
35 Widay, others volunteered to come to the school and run programs for us. They have been a  
36 good corporate neighbor to us. (F-5)

37  
38 **Comment:** So, in conclusion, Ginna has been good for the Wayne Central School District, its  
39 community, and its children. And as long as Energy East maintains the existing level of care,  
40 we are supportive of its relicensing. (F-7)

1 **Comment:** We believe it is important to retain the option to operate the plant in the extended  
2 period, thereby contributing to the overall power supply in the state and, importantly, to the  
3 energy mix in the state. (G-5) (P-5)  
4

5 **Comment:** Long-term is it a good idea to make the licensing, but if they are making their  
6 decision, or a part of their decision is based on historically how has the facility run, and what is  
7 the impression of people about it, my impression is that the facility is run in a very excellent  
8 manner, and the people that we deal with to run it are very good, and caring, and professional  
9 people. (I-4)  
10

11 **Comment:** And, in closing, the American Nuclear Society's Ginna Plant Branch is obviously in  
12 favor, and fully supportive of extending Ginna's license for 20 years. Thank you. (J-1) (Q-2)  
13

14 **Comment:** They've done a very good job protecting the workers there, along with the  
15 surrounding areas. The people always seem to come home in good shape, they have learned  
16 a lot; they've been well educated while they were there. (K-1)  
17

18 **Comment:** I'm here today to speak in favor for the renewal of the operating license for the  
19 Ginna Nuclear Power Plant. And I can only say that I hope that the NRC goes through with the  
20 licensing, it would mean a lot to this community. Thank you. (L-1)  
21

22 **Comment:** And I think we all should realize and appreciate what a well-rounded efficient plant  
23 that RG&E has at Ginna. (L-3)  
24

25 **Comment:** One of the concerns we talked about alternative sources of power. One of our  
26 major concerns, after RG&E bought it, was not the nuclear side of things, but were they going  
27 to put gigantic piles of coal about 600 or 800 feet behind our house. And then I found out, in  
28 some of the early stuff, that it generated more radiation than did the plant. So we were  
29 supporters at the start. And I did, for the town, a great deal of work regarding the safety of all  
30 this. (M-1)  
31

32 **Comment:** We believe the license should be renewed because the positive factors outweigh  
33 the negative. (M-3)  
34

35 **Comment:** In closing, I'm 41 years old; I live 11 miles south of the plant. I'm proud to be in  
36 close proximity to such facility as Ginna. (Q-1)  
37

38 **Comment:** I am writing you in support of RG&E's application for an operating license  
39 extension. I believe its operating record is worthy of relicensing. (U-1)  
40

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1 **Response:** *The comments were supportive of license renewal at Ginna and are general in*  
2 *nature. The comments did not provide significant, new information; therefore, they will not be*  
3 *evaluated further.*

### 4 5 **A.1.3 Comments in Opposition to License Renewal at Ginna**

6  
7 **Comment:** And what actually, you know, what is afforded to us at this point is the fact that  
8 Ginna, you know, if it doesn't get relicensed has seven years to plan for a shutdown. And while  
9 as an anti-nuclear person it is hard for me to say, you know, keep it running for another seven  
10 years. It affords us an opportunity to plan for the phase-out, and to plan for what is going to  
11 happen in terms of jobs, and in terms of property taxes, and in terms of the economy. We  
12 would all be a lot safer; there is no doubt about that. So why not take the chance that we have  
13 now, rather than let R. E. Ginna go forward, and charge the repairs for the process of  
14 relicensing this reactor, for any retrofits that it goes through, and deal honestly with the question  
15 of whether RG&E is going to sell this plant. (B-6)

16  
17 **Comment:** Ginna should not be relicensed. (H-11)

18  
19 **Comment:** Nuclear power is one of the more regulated industries around. The solution is not  
20 to deregulate it, or to extend it, or relicense it, but to eliminate it, to phase it out, like they are  
21 doing in Sweden and Germany. We could do it right here, we could start right here in Wayne  
22 County. (H-14)

23  
24 **Comment:** But with all due respect, to the NRC representatives here, I believe, and CAN  
25 believes, that the NRC's review of this question of extending Ginna's operating life for another  
26 20 years is really inadequate to protect the public health and safety. And that is because of  
27 some of the questions that we've asked today, such as, you know, whether – it is important  
28 what the material condition of the reactor is at this point. You know, it sounds really scientific,  
29 we got a lot of really scientific answers to that, how it is going to be dealt with? But, essentially,  
30 the NRC supports relicensing of reactors as a policy. And the NRC, the Nuclear Regulatory  
31 Commission appointed by the President, has given directives to the NRC staff to facilitate the  
32 relicensing, and the construction of new reactors, and revised the rules on the relicensing  
33 process to make that more possible, to make it easier. And so what we are stuck with is this  
34 process in which it is really difficult for the public even to challenge the relicensing of a reactor  
35 at this point. It is really difficult for the public to even intervene in this process, with all the  
36 issues that are really relevant, like the questions that people have been raising today. So in  
37 that sense, you know, it doesn't seem like this is the place to have our concerns addressed.  
38 And there is a number of groups here who are going to be appealing to the Public Service  
39 Commission in New York State to be involved in this process, and to oppose the relicensing.  
40 And I know that when we are opposing the relicensing, essentially what we are saying is that  
41 the reactor should shut down. And, you know, I live in Syracuse, I work in Oswego County, I

1 understand the terrible impact that people can conceive of when we talk about shutting down  
2 plants in this region. (B-4)

3  
4 **Response:** *The comments are noted. The comments are opposed to license renewal at Ginna  
5 and are general in nature. The comments did not provide significant, new information;  
6 therefore, they will not be evaluated further.*

#### 7 8 **A.1.4 Comments Concerning Aquatic Ecology Issues**

9  
10 As stated in 10 CFR Part 51, Table B-1, Category 1 and 2 aquatic ecology issues include:

##### 11 12 **Category 1**

- 13
- 14 • Accumulation of contaminants in sediments or biota
- 15 • Entrainment of phytoplankton and zooplankton
- 16 • Cold shock
- 17 • Thermal plume barrier to migrating fish
- 18 • Distribution of aquatic organisms
- 19 • Premature emergence of aquatic insects
- 20 • Gas supersaturation (gas bubble disease)
- 21 • Low dissolved oxygen in the discharge
- 22 • Losses from predation, parasitism, and disease among organisms exposed to sublethal
- 23 stresses
- 24 • Stimulation of nuisance organisms

##### 25 26 **Category 2**

- 27
- 28 • Entrainment of fish and shellfish in early life stages
- 29 • Impingement of fish and shellfish
- 30 • Heat shock

31  
32 **Comment:** Now, how do you determine whether or not the amount of radiation that you  
33 release into the lake, you obviously know what it is, how can you determine exactly what impact  
34 it is going to have on the ecology of the lake, given the subtleties of the changes, and is it ever  
35 considered that probably a lot of the deterioration of the lake environment – I'm talking about  
36 now only of the internal motors, I'm not talking about the air, or anything of that. The  
37 deterioration of the lake environment may be due, partially of course, to nuclear plants, but also  
38 to all the other discharges. And I don't see how you can make that kind of adequate evaluation.  
39 Okay, so we have nuclear plants, and we have a lot of other things. I don't quite see how you  
40 can get an adequate environmental impact statement on – without really taking the whole  
41 framework of the ecology there. (E-1)

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1 **Comment:** I will just say one more thing, and then I will shut up. There used to be a species of  
2 snail that was very prominent on the shores of Lake Ontario. And in my more studious days I  
3 remembered the scientific name. I don't any more. All I know is that once it did exist, and now  
4 it doesn't. (E-2)

5  
6 **Comment:** Staff have determined that the existing entrainment study (conducted in 1977) is  
7 out of date and should be updated as part of the application for NRC license extension of the  
8 Ginna facility. The initial study was conducted to meet the requirements of the 401 Water  
9 Quality Certification issued by the Department in 1974. The existing data is more than twenty  
10 years old and Lake Ontario conditions have changed considerably in this time period – including  
11 changes in populations of zebra and quagga mussels (*Dreissena* spp.), alewives, gobies,  
12 smallmouth bass, climate, etc. In addition, the 1977 study was for a very limited period of the  
13 year. More recent entrainment studies required by the Department have included studies over  
14 longer periods of time, some of which have demonstrated entrainment impacts at Lake Ontario  
15 cooling water intakes. Therefore, an updated study is recommended in order for the  
16 Department to evaluate the impacts of the facility due to entrainment. Subsequently, the  
17 Department has incorporated an entrainment study into the Draft State Pollutant Discharge  
18 Elimination System (SPDES) Permit. RG&E has commented on the draft SPDES and the  
19 Department has incorporated their comments. The draft SPDES permit is attached. The  
20 requirement to conduct an updated entrainment study will also be included as a condition of the  
21 new 401 Water Quality Certification. We recommend that the SEIS include a brief summary on  
22 the 1977 entrainment study results and the proposal to conduct an updated study of in-plant  
23 entrainment. (R-1)

24  
25 **Comment:** We recommend that the SEIS include a brief summary on impingement report  
26 results and the commitment of RG&E to continue to replace older screens. (R-2)

27  
28 **Comment:** Department staff identified the potential for increased fish mortality due to the  
29 return of the impinged fish to the discharge canal, which contains elevated temperatures from  
30 the cooling water effluent. RG&E included a brief discussion on this issue in the Environmental  
31 Report. Staff did not have enough information from this discussion to determine whether the  
32 elevated temperatures in the discharge canal result in additional fish mortality. On Monday,  
33 December 9, 2002, RG&E provided staff with a copy of the 316(a) Demonstration and  
34 Supplement (March 1977) to see if the report addresses the Department's concerns. Staff  
35 have not had the opportunity to review the report, however, they will be reviewing it over the  
36 next few weeks. We will continue to discuss the issue with RG&E and NRC on this issue.  
37 Depending on the information provided in the 316(a) report, we may either recommend further  
38 study, recommend an extension of the impinged fish return, or conclude that the concerns have  
39 been addressed. In the interim, we recommend that the SEIS include a discussion regarding  
40 Heat Shock. (R-3)

1 **Response:** *The comments refer to the aquatic ecology near Ginna. These specific comments*  
2 *as well as other aquatic ecology issues will be discussed in Chapter 2 and Chapter 4 of the*  
3 *DSEIS.*

#### 5 **A.1.5 Comments Concerning Human Health**

7 As stated in 10 CFR Part 51, Table B-1, Category 1 and 2 human health issues include:

##### 9 **Category 1**

- 11 • Noise
- 12 • Radiation exposures to public (license renewal)
- 13 • Occupational radiation exposures (license renewal)

##### 15 **Category 2**

- 17 • Electromagnetic fields, acute effects (electric shock)

19 **Comment:** All of these plants, when they are operating, all of these facilities, release some  
20 radioactivity. Some of it has a very short half-life of days or weeks; some of it, like tritium, has a  
21 longer half-life of 12 years; some is very long-lived. That brings me to point number two. When  
22 the plant was new, we did not have 40 years of radiation being released. Radiation exposure  
23 has cumulative health effects. That is why most skin cancers show up later in life. As power  
24 plants operate they expose the population, and the environment, to an ongoing burden of  
25 exposure. And just as an aside to this, outside of scoping, many scientists do not accept  
26 threshold dose and hormesis as valid, no matter what the HPs (health physicist) say. So the  
27 longer these plants operate basically the more dose, cumulative, the population receives.  
28 Population around Ginna, number three, is much higher than it was when the plant was built.  
29 This is no longer a rural area; it is now a suburban area. (H-5)

31 **Response:** *The comment is noted. Radiation exposure to the public and workers was*  
32 *evaluated in the GEIS and determined to be a Category 1 issue. The NRC's regulatory limits*  
33 *for radiological protection are set to protect workers and the public from the harmful health*  
34 *effects of radiation on humans. The limits were based on the recommendations of standards-*  
35 *setting organizations. Radiation standards reflect extensive scientific study by national and*  
36 *international organizations (International Commission on Radiological Protection [ICRP],*  
37 *National Council on Radiation Protection and Measurements, and National Academy of*  
38 *Sciences) and are conservative to ensure that the public and workers at nuclear power plants*  
39 *are protected. The radiation exposure standards are presented in 10 CFR Part 20, "Standards*  
40 *for Protection Against Radiation," and are based on the recommendations in ICRP 26 and 30.*

## Appendix A

1 Numerous scientifically designed, peer-reviewed studies of personnel exposed to occupational  
2 levels of radiation (versus life-threatening accident doses or medical therapeutic levels) have  
3 shown minimal effect on human health, and any effect was from exposures well above the  
4 exposure levels of the typical member of the public from normal operation of a nuclear power  
5 plant.

6  
7 The comment provides no new information, and does not pertain to the scope of license  
8 renewal as set forth in 10 CFR Parts 51 and 54. Therefore, it will not be evaluated further.  
9

### 10 **A.1.6 Comments Concerning Socioeconomic Issues**

11  
12 As stated in 10 CFR Part 51, Table B-1, Category 1 and 2 socioeconomic issues include:  
13

#### 14 **Category 1**

- 15 • Public services: public safety, social services, and tourism and recreation
- 16 • Public services, education (license renewal term)
- 17 • Aesthetics impacts (refurbishment)
- 18 • Aesthetics impacts (license renewal)
- 19 • Aesthetics impacts of transmission lines (license renewal term)
- 20

#### 21 **Category 2**

- 22 • Housing Impacts
- 23 • Public services: public utilities
- 24 • Public services, education (refurbishment)
- 25 • Offsite land use (refurbishment)
- 26 • Offsite land use (license renewal term)
- 27 • Public services, transportation
- 28 • Historic and archaeological resources
- 29

30  
31 **Comment:** Thirdly, it has to do with the standard of living for my children. Ginna provides  
32 approximately 500 RG&E jobs at its plant. In addition there are about 300 related jobs through  
33 private contractors. Now, most of those people live in my school district, and they are parents  
34 of my schoolchildren. My children live in decent homes, and have middle class values, and  
35 middle class opportunities because of Ginna. Because of this we believe we can offer the best  
36 of both worlds. We live in a pleasant rural community, but we have the benefits of a suburban  
37 type school district. (F-6)  
38

39 **Comment:** But beyond that our employees give back to the community in a variety of ways.  
40 They serve on school boards, and town boards, as scout leaders and sports coaches, they  
41 support day care centers, and senior centers. They serve on ski patrols, and they train guide  
42 dogs. Our employees raised money to donate a defibrillator to the Ontario Volunteer

1 Ambulance Service. We partner with the Wayne Central School District by providing them with  
2 the space for their Eagles Ventures program, a program for those students who can benefit  
3 from an alternative educational program, and setting. We continue to participate, on an annual  
4 basis, in the science and exploration days of the St. John Fisher College, contributing to interest  
5 in science on the part of the young people in the community, and we participate in the Annual  
6 Day of Caring, among others. (G-8) (P-7)

7  
8 **Comment:** It is used by more people every year, as a water source. I understand Newark may  
9 be expanding the water district that will now tap into Lake Ontario water. I could be wrong, but I  
10 do know that more and more municipalities are depending on Lake Ontario water. (H-4)

11  
12 **Comment:** But a lot of things, talking about the jobs, and talking about the economic impact. I  
13 just can't imagine taking a facility with the assessed value that plant has out of a town just like  
14 Webster, and what the impact would be. I mean, we could probably sit down and even crunch  
15 numbers, but it would be significant. And it would be even more significant, would be my  
16 guess, from my – what I see as a relative relationship between what the town of Ontario is like,  
17 and what the town of Webster is like. So certainly you are going to have an impact there with  
18 that reduced assessed value should that not have a plant, or some facility there. And, of  
19 course, the job impact too. And I don't think we can really minimize it, in the economy these  
20 days. The jobs, I know a lot of people right here in Webster, and in the surrounding area, do  
21 work, rely on their jobs at the plant. So there certainly are the economic factors that are a  
22 certainty would be negative. (I-1)

23  
24 **Comment:** The reason is very simple for us; it is jobs for our members who live in this  
25 community. Since the plant was built the Rochester Building Trades have been involved with  
26 the building of the plant, and supplementing the RG&E personnel when it comes to maintaining  
27 this plant. During shutdowns at the plant RG&E has always made sure that subcontractors  
28 have hired local craftsmen to do their work. This has provided good paying, safe jobs for the  
29 people that live in this community. (L-2)

30  
31 **Comment:** Ginna provides jobs for our local residents. RG&E, now Energy East, is a  
32 significant contributor to the tax base in the town of Ontario. This has enabled Ontario to  
33 maintain a reasonable tax rate, and we hope this continues. RG&E has been a good neighbor.  
34 They have been sensitive to the immediate neighborhood by keeping the rural setting of  
35 orchards and acres of green space. (M-5)

36  
37 **Comment:** In the past there has been a problem in establishing an assessed value of Ginna  
38 for local property tax purposes. Although this is a local and state issue, the relationship  
39 between Energy East and the town of Ontario is a key factor in establishing a fair assessed  
40 value. Although the ultimate assessed value of the property lies with the local assessor, it is  
41 hoped that the good relationship with the town established by RG&E will continue. Energy

Appendix A

1 East, albeit a new arrival, has yet to establish its credentials as a good neighbor, with  
2 commitment to the health and welfare of Ontario, and the surrounding area. (M-8)

3  
4 **Comment:** This past year the plant actually paid 30 percent of the tax bill. This revenue has  
5 been very useful to the town in terms of developing the town, and also holding down the tax  
6 rate. The 15 towns in Wayne County, Ontario has the lowest tax rate. I hope that with the  
7 continued presence of the plant, it will continue to support a significant portion of our tax levy.  
8 Or in lieu of that, the negotiations, some kind of a pilot agreement between the town and  
9 RG&E, and/or the county and the school district, and RG&E. (O-6)

10  
11 **Comment:** It is a responsive neighbor to my town and county. The plant is a substantial  
12 taxpayer in my county and provides several hundred jobs. (U-3)

13  
14 **Response:** *The comments are noted. Socioeconomic issues specific to the plant are Category*  
15 *2 issues and will be addressed in Chapter 4 of the DSEIS. The comments did not provide*  
16 *significant, new information; therefore, they will not be evaluated further.*

17  
18 **Comment:** My major beef was what I call light pollution. And on cloudy nights, particularly in  
19 the winter, the snow is orange, but it hardly has to do with the safety. (M-9)

20  
21 **Response:** *The comment is noted. Socioeconomic issues related to aesthetic impacts of the*  
22 *plant during the license renewal term are Category 1 issues and were addressed in the GEIS.*  
23 *The comments did not provide significant, new information; therefore, they will not be evaluated*  
24 *further.*

25  
26 **Comment:** Although the State Historic Preservation Office has deemed no effect for the  
27 undertaking, the Seneca Nation THPO has concerns with the uncertainty of ground disturbing  
28 activities related to the project. The location and the history of the area surrounding Ginna are  
29 highly sensitive. The Seneca Nation THPO would like to be consulted, in the earliest planning  
30 stages, on any ground disturbing activities that may occur. (S-4)

31  
32 **Response:** *The comment refers to Historic and Archaeological resources near Ginna. This*  
33 *comment will be addressed in Chapter 4 of the DSEIS.*

34  
35 **Comment:** The following text is suggested as a replacement to the first sentence of the  
36 second paragraph of 2.12.1 on page 2-41: "The Monroe County Water Authority (MCWA),  
37 which can produce 145 million gallons of treated water per day (mgd), was created by an act of  
38 the New York State Legislature in 1950 and its legislation has been amended several times to  
39 allow it to serve areas beyond Monroe County. Today the MCWA is a metropolitan regional  
40 water purveyor, providing retail water service to most of Monroe County, several communities in  
41 Genesee County and some small portions of Livingston and Ontario Counties. It exchanges

1 water with the Town of Ontario, Wayne County, provides wholesale water service to the Wayne  
2 County Water and Sewer Authority (WCW&SA), the Town and Village of Victor, Ontario  
3 County, three communities in Genesee County, and four adjoining communities in Orleans  
4 County." (T-1)

5  
6 **Response:** *The comment refers to the water use near Ginna. Water use will be discussed in*  
7 *Chapter 4 of the DSEIS. The comment is editorial in nature and will be considered in writing*  
8 *this section of the DSEIS. Although the comment will be considered editorially, it provides no*  
9 *significant, new information to the environmental review of Ginna; therefore, the comment will*  
10 *not be evaluated further in that context.*

### 11 12 **A.1.7 Comments Concerning Land Use Issues**

13  
14 As stated in 10 CFR Part 51, Table B-1, Category 1 land use issues include:

- 15 • Onsite land use
- 16 • Power line right of way

17  
18  
19 **Comment:** Department staff requested that RG&E provide an evaluation of the ongoing coastal  
20 erosion onsite and at neighboring properties to the Environmental Report. A brief discussion  
21 was provided. Department staff have concerns about the ongoing coastal erosion on both  
22 sides of the shoreline protection. Subsequently, we have added a condition to the recent Article  
23 34 Coastal Erosion Control Permit to RG&E, to require a survey of the existing shoreline.

24  
25 We recommend that the ongoing coastal erosion issues be addressed in the SEIS. The survey  
26 should be prepared in time for inclusion into the SEIS. We recommend that the Federal NEPA  
27 process identify whether any additional shoreline protection is required to protect the facility  
28 over the renewal permit term. (R-5)

29 **Response:** *The comment refers to land use issues near Ginna. This issue will be addressed*  
30 *in Chapter 2 and Chapter 4 of the SEIS.*

### 31 32 **A.1.8 Comments Concerning Uranium Fuel Cycle and Waste Management Issues**

33  
34 As stated in 10 CFR Part 51, Table B-1, Category 1 uranium fuel cycle and waste management  
35 issues include:

- 36 • Offsite radiological impacts (individual effects from other than the disposal of spent fuel  
37 and high level waste)
  - 38 • Offsite radiological impacts (collective effects)
  - 39 • Offsite radiological impacts (spent fuel and high level waste disposal)
  - 40 • Nonradiological impacts of the uranium fuel cycle
- 41

## Appendix A

- 1 • Low-level waste storage and disposal
- 2 • Mixed-waste storage and disposal
- 3 • Onsite spent fuel
- 4 • Nonradiological waste
- 5 • Transportation

6  
7 **Comment:** If plans go as scheduled, Yucca Mountain will then open up, as a storage facility,  
8 and the waste will be trucked down 590, which is within two miles of my house, which is why I  
9 have my potassium iodide. (C-1)

10  
11 **Comment:** We touched on transporting nuclear waste, and also the containment chamber  
12 safety requirements. What I'm trying to say here is that back in the '80s we had a way of  
13 looking, had development money to work for isotope separation. Which says we can take  
14 these rods and like a battery, make them over, and over again, maybe nine times on the  
15 contract, but actually figure we could probably get about 20 uses out of them. Which means  
16 the storage goes down, and you have to have them onsite. You can keep reusing them, and  
17 recharging them. Did that whole science fall apart, or what? It was funded by – I was working  
18 on that in Los Alamos, and also Lawrence Livermore had contracts for that. And it looked like it  
19 had great hope. Did that ever turn out to be viable? (D-1)

20  
21 **Comment:** And I don't know a lot of statistics, I can't quote a lot of this, but my big concern is  
22 what happens to the waste from all of the thousands of nuclear power plants around the  
23 country, that we keep accumulating the waste, and keep piling it up, and keep stockpiling it with  
24 half-life of thousands of years, without any concern for what is going to happen to the people in  
25 the future that will have to deal with it. (E-3)

26  
27 **Comment:** When the plant was built there was no spent fuel on the site. It was supposed to  
28 be removed. Politics and logistics are leading other nukes to use dry cask storage onsite. Will  
29 this plant, how long will it be there, what about security for it? (H-7)

30  
31 **Comment:** Secondary is what happens to the waste products. We were assured, by the  
32 Federal government, I don't recall it was – I believe it was the AEC at the time that this material  
33 would be trucked away. And indeed, for a while, I believe it did go to West Valley, until its  
34 closure. (M-2)

35  
36 **Comment:** When Ginna started this operation, in 1970, the spent nuclear waste was trucked  
37 out of this area to West Valley. This was changed several years ago, and the waste is now  
38 stored onsite. We believe that the local citizens should know when this spent fuel will be  
39 removed from the present site. The answer to this issue should be part of the permitting  
40 process. The Federal government has the responsibility for this, and has committed billions of  
41 dollars to the proper storage of spent nuclear fuel. When will this happen? (M-7)

1 **Comment:** Also, I'm very interested in whether or not the environment has been taken into  
2 account in terms of what happens to exhausted fuel. (N-1)

3  
4 **Comment:** Although the Department does not have concerns regarding State regulated  
5 hazardous waste storage, staff recommend that the future handling of the spent-fuel inventory  
6 and containment be addressed in the SEIS. (R-4)

7  
8 **Comment:** The environmental impact statement should analyze the ability of the plant to store  
9 its spent nuclear fuel on plant property. The environmental impact statement should analyze  
10 the risks of transporting the spent nuclear fuel to the Federal repository. This analysis should  
11 include potential truck routes and rail routes, and depending on the routes, should be  
12 coordinated with the Seneca Nation regarding the impacts to cultural resources along potential  
13 transportation corridors. (S-3)

14  
15 **Response:** *Onsite storage and offsite disposal of spent nuclear fuel are Category 1 issues.*  
16 *The safety and environmental effects of long-term storage of spent fuel onsite has been*  
17 *evaluated by the NRC, and as set forth in the Waste Confidence Rule, the NRC generically*  
18 *determined that such storage could be accomplished without significant environmental impact.*  
19 *In the Waste Confidence Rule, the Commission determined that spent fuel can be stored onsite*  
20 *for at least 30 years beyond the licensed operating life, which may include the term of a*  
21 *renewed license. At or before the end of that period, the fuel would be moved to a permanent*  
22 *repository. The GEIS is based upon the assumption that storage of the spent fuel onsite is not*  
23 *permanent. The plant-specific supplement to the GEIS regarding license renewal for Ginna will*  
24 *be prepared based on the same assumption. The comments did not provide significant, new*  
25 *information; therefore, they will not be evaluated further.*

#### 26 27 **A.1.9 Comments Concerning Alternative Energy Sources**

28  
29 **Comment:** And I don't understand why we are taking this risk. I don't understand why we are  
30 not talking about wind generation on Lake Ontario. I just – I think we need to look at the  
31 alternatives. We are subsidizing the nuclear industry. Bush's energy plan calls for a \$2.9 billion  
32 subsidy to nuclear industry, and the solar industry's subsidy would be enough to build about two  
33 miles of Federal interstate. So it seems like we need to look at the alternatives. And I'm not,  
34 myself, and the hundreds of members of Metro Justice, are not willing to take the risk involved.  
35 (C-3)

36  
37 **Comment:** Virtually every new power plant in New York depends on natural gas as the fuel of  
38 choice. And as we have learned, in the past several years, the price of natural gas can  
39 fluctuate greatly. This means that the price of electricity from gas fired power plants, would also  
40 correspondingly fluctuate. To further complicate matters, even for those new plants receiving  
41 siting approval, plant developers are finding it difficult, to impossible, to obtain financing. The

## Appendix A

1 New York state power plant siting law is scheduled to expire at the end of this year. And a  
2 number of older plants may need substantial new investment, if it is available, to meet new  
3 environmental standards. (G-7)  
4

5 **Comment:** And today there are more efficient, cleaner, and safer ways to make electricity.  
6 (H-2)  
7

8 **Comment:** Finally, the world of energy production has changed since 1960. We really don't  
9 need nuclear plants any more. There are cleaner, safer ways to produce power. Denmark now  
10 gets about ten percent of its power from wind. Their goal is half by 2030. California just  
11 passed a renewable energy requirement of 20 percent in 20 years. We could do this in New  
12 York. There have also been huge improvements in cogeneration technology, which is very  
13 much more efficient than the large centralized plants. I would just add, I scribbled this down  
14 during the meeting, and then it was brought up by someone else, that a good environmental  
15 impact statement does consider alternatives. I'm glad to hear that they will be considering  
16 alternative ways of producing electricity. (H-10)  
17

18 **Comment:** And as far as that tax base concern there could be other things, perhaps even  
19 another generating facility, that would be safer and cleaner, that could pick up some of that  
20 economic and tax concern, and it could even enhance the area's economic activity. (H-15)  
21

22 **Comment:** And you heard about, a couple of years ago, how terrible it was to live out in  
23 California, and be a resident, and try to run a business out there with the rolling blackouts, or  
24 brownouts, or whatever they were having, and we have not had any of those types of  
25 experiences, at least in this part of New York State, and not that I'm very widely aware of,  
26 throughout our state. And to think that we would have to find something to replace that. And if  
27 we were not to relicense a lot of these facilities around the state, and the country, we would  
28 have to find a whole lot of things to replace a lot of that energy that is being created, that is just  
29 another side of what is to be looked at. (I-3)  
30

31 **Response:** *The comments are noted. The GEIS included an extensive discussion of*  
32 *alternative energy sources. Environmental impacts associated with various reasonable*  
33 *alternatives to renewal of the operating licenses for Ginna will be discussed in Chapter 8 of the*  
34 *DSEIS. The comments did not provide significant, new information; therefore, they will not be*  
35 *evaluated further.*  
36

### 37 **A.1.10 Comments Concerning Safety Issues Within the Scope of License Renewal**

38

39 **Comment:** And I wasn't quite clear on how you are going to evaluate, as part of the renewal  
40 process, the long-term degradation issues that are very prominent in nuclear power plants  
41 across the country, Ohio being one, Virginia another one. The cracks and the various issues

1 that have surfaced and have caused great concerns in a number of communities across the  
2 country, how do you propose to make the public aware of the process that you are going to be  
3 using in evaluating degradation? (A-1)  
4

5 **Comment:** That is, obviously fine, because that is part of the day-to-day inspection. I'm talking  
6 about a 20 year out in the future evaluation by the NRC, how are you going to go about  
7 evaluating long-term degradation on that basis? (A-2)  
8

9 **Comment:** There has to be, in my view, if you are extending a plant that has an age of 30 plus  
10 years, another 20 years, if you are giving approval for that, there has to be something concrete,  
11 in my view, that has to be given to the public, that estimates the degradation factors that this  
12 plant will experience, over time, and gives the public some comfort that these aging plants that  
13 many, many people feel should be shut down yesterday, are actually able to stay online safely  
14 for another 20 years. (A-3)  
15

16 **Comment:** I'm with the Citizens Awareness Network. And just for clarity's sake, I wanted to  
17 sort of test this. It seems like the answer to this woman's question is that, no, the NRC isn't, as  
18 part of the relicensing process, going to do a systemic review of the aging and degradation of  
19 the reactor. (B-1)  
20

21 **Comment:** I understand that. I mean, what I'm saying is, you know, it seemed like the  
22 question was whether as part of reevaluating the relicensing application, whether NRC does,  
23 you know, an actual material condition inspection review, to determine whether this reactor  
24 could safely operate for another 20 years. And didn't this used to be included as part of the  
25 relicensing process? And there were certain reactors that were preparing their applications that  
26 determined that the reactor was already too degraded, like Yankee Rowe? (B-2)  
27

28 **Comment:** And it is instructive to talk about the reactor vessel head, in terms of inspections  
29 and replacements. In the early 1990s, based on French experience, we began to perform  
30 additional inspections, visual inspections, on our reactor vessel head. In 1999 we took the  
31 opportunity, with our extended ten-year end service inspection to do detailed, non-destructive  
32 examinations, and visual inspections, of our vessel head. In each of those cases we saw no  
33 degradation, no defects. We performed additional inspections, both non-destructive  
34 examinations, and visual inspections, in our most recent refueling outage, in 2002. And, again,  
35 saw no degradation, and no defects. Nevertheless, looking to the future, even just to 2009, we  
36 reached the conclusion to replace that reactor vessel head to provide us an economic benefit,  
37 and to give us additional margin and assurance. That vessel head will be replaced in the fall of  
38 2003, our next refueling outage. (G-3)  
39

40 **Comment:** Some of its components were designed to last its licensed life. There have been  
41 many other age related failures besides this one. Nine Mile core shroud, that steam generator

## Appendix A

1 rupture in 1982 at Ginna was not anticipated; embrittlement of the reactor vessel, these all  
2 surprised the experts. There are probably going to be more surprises as these plants age.  
3 (H-9)  
4

5 **Response:** *The comments are noted. The NRC's environmental review is confined to*  
6 *environmental matters relevant to the extended period of operation requested by the applicant.*  
7 *To the extent that the comments pertain to safety of equipment and aging within the scope of*  
8 *license renewal, these issues will be addressed during the parallel safety analysis review*  
9 *performed under 10 CFR Part 54. Operational safety issues are outside the scope of 10 CFR*  
10 *Part 51 and will not be evaluated further in this SEIS. The comments provide no new*  
11 *information and, therefore, will not be evaluated further in the context of the environmental*  
12 *review. However, the comments will be forwarded to the project manager for the license*  
13 *renewal safety review for consideration.*  
14