

## **Comments for the NRC's public scoping meeting regarding the Generic Environmental Impact Statement Update for the Relicensing of Commercial Nuclear Reactors, July 17, 2003**

My name is David Agnew. I live in Chatham, Massachusetts, and I am coordinator of Cape Downwinders, whose mission is to take action to protect the lives and welfare of the residents of Cape Cod, Martha's Vineyard and Nantucket against the threat of death or injury resulting from the use of nuclear energy at Pilgrim and other locations. By congressional mandate, this is also the NRC's mission.

1. This process is a sham. The NRC regulates corporations which damage and destroy life in order to make a profit (in this case by generating electricity). The question is how many cancers and birth defects and how much genetic damage is acceptable, and to whom is it acceptable. According to the NRC's own estimates, the proposed GEIS will allow the killing over 1,000 people over 20 years - if all goes perfectly.

Theoretically public input is valued, but this process allows just 12 hours of input from the entire US populace on the issue of what is an acceptable amount of radiation poisoning for our nation for another 20 years (perhaps more)! To comment on the process we are expected to use your website to find and study hundreds of lengthy rules, supplements, and addendums. Because the NRC website was non-functional for 48 hours last weekend (the electronic reading room was still not available Monday afternoon), I contend that you should hold an additional public meeting a month from now to accommodate people who were unable to review the GEIS in a timely manner.

2. In April, 1985 testimony before Congress, NRC chairman Palladino said "there is a 45% chance of another severe core melt accident at a U.S. reactor by the year 2005". Does this mean that such a failure is highly likely in the near future? Or are we to believe that as the nation's commercial reactors continue to corrode, crack and become embrittled, they become safer? Or perhaps the NRC believes that economic pressures to cut operating budgets increase safety? Since we have seen by the recent near-failure of a reactor vessel head, that the NRC is unwilling to enforce its own regulations, does the GEIS presuppose the regular and continuing failure to regulate by this agency? It should. It's clear that little was learned from TMI, as safety equipment to avoid the hydrogen explosion portion of that disaster have been non-functional at Davis-Besse for over 25 years. The ineptitude of this agency in 'regulating' is mind-boggling. [Question to NRC staff:] What are the odds of a severe core melt at a US CNR before 2040?

3. The secret 1982 Sandia Labs CRAC II study found that the consequences of a severe accident at a nuclear power station would be devastating - unacceptable to anyone not blinded by greed or power. Regarding the size of populations surrounding our nuclear stations, the value of property, and the risk of injury from ionizing radiation, that document is extremely outdated. Is the GEIS based on a newer study of accident consequences? Is that document secret? The GEIS should be based on a new, public, independent study of accident consequences, funded by those who profit from placing the public at risk. With the total failure of national defense that occurred on September 11, 2001, we saw that our adversaries are capable of sophisticated planning & great ruthlessness in their effort to cause harm to this nation. Since then, our government has provoked many more to consider harming us, and done little to protect the most vulnerable targets. Until it can be PROVEN that the nation's reactors, control rooms, and spent fuel storage could prevent or withstand a similar or more powerful terrorist attack (like a Lear jet filled with C4), the purpose and need for the GEIS update is NOT clear, as all consideration of license renewals is a waste of resources, and the renewal process should be terminated. However, should this agency continue relicensing - proceeding with criminal recklessness with no guarantee against a successful attack - then the GEIS update should address the impact of a catastrophically successful terrorist attack.

4. What are the agency's assumptions regarding risk of health effects from ionizing radiation? If they are not consistent with those of Dr. John Gofman, they are probably wrong (he has the only track record for being 'right' on this subject), and thus the 'impact' part of the GEIS faulty. The GEIS should assess risk (impact) using assumptions of biological harm from ionizing radiation that are at least as cautious as Dr. Gofman's. Continuing radiation doses to the public at current levels is unacceptable. Millirem by millirem, this agency facilitates cumulatively raises the background radiation levels worldwide. Genetic damage to the entire biosphere (save humans) is stridently ignored, without even estimating the repercussions. This is not only unwise, it's insane. We have nuclear power because the public was misled by statements of 'electricity too cheap to meter' and assurances by the likes of Dixie Lee Ray that nuclear waste was so small and harmless that she would eat her share. We now know that we were being lied to: a vast amount of radwaste has accumulated, and unfortunately, the head of the AEC never ate her plutonium. Because the public was once fooled into believing that nuclear energy was safe and cheap does not make it acceptable to perpetuate the lie.

5. Until the once-through reactor cooling systems are re-engineered to meet existing environmental protection requirements, nukes dependent upon them should be closed. Once-through cooling, with it's the destruction of fish, shellfish, birds, sea turtles, and marine mammals due to impringement and temperature shock is unnecessary and unacceptable. The thermal pollution of a billion gallons of water per reactor per day is evidence of the inefficiency of this outdated technology, and the full effect of this primitive practice is not understood. To suggest the continuation of this violation of environmental protection laws for an additional 20 years is absurd. At a minimum, the addition of cooling towers, which would reduce thermal pollution and attendant environmental destruction to 1/25th of it's present rate, should be required.

6. The assumptions about emergency planning that held sway when present reactors designed their EPPs - presumed sufficiency of a ten-mile zone, no awareness of shadow-evacuation, blissful ignorance of the power of co-ordinated, multi-pronged terrorism - to name a few, are now antiquated, and all licensees should be required to develop new, independently-approved Emergency Preparedness Plans which plan for today's conditions and those anticipated at the end of their relicensed period.

7. In Table B the Commission states the following regarding "low-level" waste storage and disposal: "...the low public doses being achieved at reactors ensure that the radiological impacts to the environment will remain small during the term of a renewed license... [the] impacts of long-term disposal of low-level waste from any individual plant at licensed sites are small. In addition, the Commission concludes that there is reasonable assurance that sufficient low-level waste disposal capacity will be made available when needed".

Where is the evidence for 'reasonable assurance that sufficient low-level waste disposal capacity will be made available'? This is an example of the arrogance of this agency. The American public does not want to be dosed with radiation. Since there is no safe dose of ionizing radiation, referring to radiological impacts as 'small' is akin to saying that a restaurant regularly serves 'only a little botulism'. The doses may be small to you, but for the parents of a child with birth defects, they are not. Shouldn't this agency at least PRETEND to respect the citizens it is mandated to protect?

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