

From: Ned Ford <Ned.Ford@fuse.net>  
To: <GrandGulfEIS@nrc.gov>  
Date: Sun, Feb 8, 2004 4:46 PM  
Subject: No to Grand Gulf

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Rules and Directives  
Branch  
USNRC

By e-mail to:  
GrandGulfEIS@nrc.gov

February 8, 2004  
From Ned Ford

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

Re: Early Site Permit for new nuclear reactor at Grand Gulf Nuclear Power Plant, Port Gibson, Miss.

Dear Sir/Madam,

I urge you to reject the application for new nuclear plants at Grand Gulf near Port Gibson, Miss. In Ohio, our economy has been crippled for decades by the costs imposed by the two completed nuclear plants and the one failed project, which nonetheless required rate increases far in excess of those needed for new plants of other technologies.

Although I personally offered testimony to the Zimmer plant relicensing hearing before the Army Corps of Engineers, and Army Corps rules specifically obligate them to consider evidence to the availability of less expensive, intrusive or damaging alternatives, this evidence was ignored, and the plant was converted, even though nearby utilities had excess capacity in excess of that which Zimmer was to provide, already built and operating. Although a new coal plant built from scratch would have cost around \$1,000 per KW of capacity, the Zimmer plant cost over \$2,600 per KW of capacity. Although there have been no nuclear plants built in the U.S. for several decades, it is clear from costs of nuclear plants in other countries that nuclear power is still more expensive than coal, natural gas, or wind power, including the cost of fuel and the typical availability of the wind facility, when measured on the basis of cost per KWH. This is true even considering the large price increases in natural gas fuel in the last three years.

Although the NRC may not feel this hearing obligates a consideration of safety, I will point out that the recent failure of the First Energy corporation to observe an acid leak in the reactor core at the Davis Besse plant, which must have taken a number of years to develop, indicates that the current practices of the NRC in overseeing nuclear plant management are undemonstrated, if you have changed practices at all. You will note that what the public deserves and demands is actual change, not the change in printed rules, which we know has occurred in the wake of the second nearly-catastrophic accident at Davis Besse since it opened.

Other respondents to this hearing will address the questionable wisdom of siting a new nuclear plant in an area exposed to extreme weather events. I would like to add that a recent public policy forum item in

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the January 9th issue of Science Magazine by David King, the Chief Scientific Advisor to the British Government, Office of Science and Technology, observed that even the very modest observed sea level rise due to increased global mean temperature over the last century has caused significant increases in the tidal and fluvial events requiring closure of the Thames Barrier to protect London from flooding. Expected sea level changes in the next century are likely to be substantially greater than those in the past century. Although proponents of nuclear power will claim that this technology will reduce global warming, a substantial amount of warming is already committed to by past emissions, and nuclear power is an unrealistic alternative to global warming because of the many cheaper alternatives. The most important alternative to fossil fuel emissions is energy efficiency, and while some parts of the nation have had strong efficiency programs in place and operating for several decades, Mississippi has had nothing of significance. Since efficiency is available in massive quantity and cheaper than the cost of operating a conventional power plant of any sort (the operating cost alone, not including the capital cost of a new plant), the need for the proposed nuclear plants is a fragile assumption. In addition, there is substantial doubt about the ability to develop a large amount of nuclear power without a complete reconstruction of the U.S. Department of Energy nuclear fuel refining process, an expense which should not be borne by the taxpayer in a deregulating electric market, and which cannot be borne by the utility industry if new nuclear plants are to pass the laugh test.

Although I am far from the proposed site, and do not expect to have direct exposure to the problems created by any nuclear plants that are eventually built in Mississippi, I am a U.S. citizen and have grave concerns about the stability of our economy which has been undermined by mismanagement and corruption by the power industry, particularly the nuclear industry. Current examples of this corruption are the extension of the Price Anderson waiver of liability, the refusal of the industry to pay the Federal Government for fuel processing costs, and the assumption by wheelers and dealers that accumulated ratepayer funding of plant decommissioning costs can be claimed as private property if instead of decommissioning, the plant is simply entombed and left for future generations to deal with. Congress may be supporting nuclear power, but that doesn't make it morally legitimate to subsidize a technology which cannot possibly stand on its own, especially when that technology poses safety threats.

In the era of terrorist scares, it might serve to think for a minute about the issues raised by nuclear plants. It is not just the plant that amounts to a giant invitation to terrorist acts, but the transported fuel, the spent fuel, the waste materials from the plant, and more. In my community, a struggling steel company lost most of a year in one of their main furnaces when someone slipped a load of radioactive steel into a shipment of recycled steel. As nuclear power proliferates, the availability of highly radioactive building materials which can be used deliberately or accidentally to injure individuals and groups of people increases. Do we all have to buy our own personal geiger counters so that a handful of corporate executives can enjoy the satisfaction of propping up a failed industry?

The deeper one digs into the past and present practices of the nuclear

industry, the less supportable it becomes. I understand this plant is to be sited in a community with little economic resources, and there will probably be promised of riches to be had in the form of property tax relief, or new schools and hospitals, or the other similar bribes that have been offered to similar communities in the past. Well, in Ohio, we cannot point to a single person who has died from radioactive exposure from the nuclear plants here. However, as much of the State has experienced the loss of billions of dollars in the form of disproportionate rate increases for a modest amount of power, it is inevitable that thousands of lives have been lost and will be lost because of the degradation of public services, personal and corporate wealth and the other impacts of draining a few percentage points of the entire local economy have accrued.

We will hope that the proponents of these plants will be required to operate in a truly competitive mode, but that of course won't happen until Price-Anderson is repealed, and Congress stops handing out gifts to proponents of this technology. In the mean time, the existence of a new expedited permit process does not mean that an expedited permit is a responsible thing to approve.

Sincerely,

Ned Ford  
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Cincinnati, Ohio 45208  
513-533-9244  
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I am writing to express my objections to the proposed expansion of the Grand Gulf Nuclear Power Plant located near Port Gibson, Miss. I oppose a permit for this plant because of site characteristics that pose an undue risk. This facility is located on the Mississippi River in an area prone to damage from hurricanes, tornadoes and flooding. An accident or act of sabotage at this facility and its growing inventory of nuclear waste could contaminate the Mississippi River, New Orleans and the Gulf of Mexico. It could be devastating to everyone downstream and downwind including seafood industries that produce economic benefits each year totaling many millions of dollars.

One major concern is inadequate emergency planning and infrastructure in Claiborne County and beyond. Due to the Mississippi Legislature's decision to take away \$200 million in tax revenues generated from Grand Gulf and give them to other counties in the state, Claiborne County's emergency planning infrastructure is woefully underfunded to deal with the present nuclear plant-let alone a new plant. There is not adequate money available to fund the Sheriff's Department, Civil Defense or the Fire Department. There is only one fire station in the rural county, and the hospital in Port Gibson is not open 24 hours per day. The radiological emergency plan relies heavily on teachers to shelter and evacuate school children without obtaining adequately informed consent or any statutory authority.

Entergy wants to dump yet another dangerous facility on the mostly African American residents who live in Claiborne County, which is 82 percent African American. This is a clear case of environmental racism. There are significant impediments to emergency planning to safeguard area residents in

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case of an accident or act of terrorism at the facility. Please deny this request for an early site permit for expansion of Grand Gulf Nuclear.

Sincerely,