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 To: <opa@nrc.gov>
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 Subject: Public comment letter, Federal Register 5/27/04

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 69FR 11462

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Rules and Directives
 Branch
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League of Women Voters of Tennessee-- to Office of Public Affairs:

Please forward the letter, below to the Rules and Directives Branch at the Nuclear Regulatory Division. The electronic address stated in the Federal Register for comment submission would not cooperate for such purpose. That address, as stated is
 < HREF="mailto:BrownsFerryEIS@nrc.gov">BrownsFerryEIS@nrc.gov<A>.

We will appreciate assurance that our comment letter is received by the deadline, June 4, 2004.
 Frances Lamberts, Natural Resources Co-Chair, League of Women Voters of Tennessee

June 3, 2004
 Chief, Rules and Directives Branch

Division of Administrative Services

Office of Administration

Mailstop T-6D59

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Federal Register 3/10/04, 11462-11464

Federal Register 5/27/04, 30338

Dear Chief:

We appreciate the extension of the scoping comment period for license renewal of the Browns Ferry nuclear plant, Units 1, 2, and 3, as referenced above (FR 5/27-04). The League of Women Voters of Tennessee wishes to submit comment on this matter for your consideration.

With letter of May 14, 2003 we had urged of the Board of Directors of the TVA a decision against the restarting of Unit 1 of the Browns Ferry plant. Some of the issues of concern to us then have wider application to expansion of nuclear energy, generally and to design and operations features of the Browns Ferry facility in particular.

In general, the League of Women Voters supports energy policies that work to reduce growth rates. This is of especial note for TVA in whose service area per capita electricity consumption ranks highest in the nation and which has failed to engage in significant efforts at managing the demand side of electric energy. The League believes that an emphasis on conserving energy and using energy-efficient technologies is by far the wisest and safest course of action for our nation and state. With absence of

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substantive efforts toward this end by the TVA, the granting of licenses to simply extend (or even expand) this provider's nuclear energy capacity for almost a generation's lifetime seems to us inappropriate.

The League also believes that predominant reliance should be placed on production of energy from renewable sources. We have applauded and strongly support the TVA's initiation of a Green Power Switch program whose wind, solar, and methane gas installations now produce electric power for more than seven thousand residential and business users. At this time, however, TVA's generational capacity under this program makes up less than one percent of its capacity from the two, now operating Browns Ferry units. For ecological and other reasons, the strongest market trends in the energy field, around the world favor energy production from renewable sources and weight of public opinion is on the side of expansion of these sources, at least within the Tennessee part of the Agency service area. The fiscal prudence of TVA's expenditure of at least \$2 billion estimated to bring Unit 2 back from mothball status should be weighed against longer-term economic, marketing, and social advantages of investment in energy sources of the future instead of last century's.

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In this context, we object to the proposed twenty-year license extension for reactor Unit 1, whose current operating license will expire on December 20, 2013 but which has been on (legally undefined "administrative hold") in-operational status since more than a decade and a-half ago. Recurrent, safety-related difficulties had been observed at this Unit at least since the 1975 fire which destroyed its safety equipment for core and plant cool down, avoiding "by sheer luck"--as reported-- a potentially catastrophic external release of radiation. The difficulties are known to involve dangerous risk factors such as cracks in emergency cooling systems, inappropriate cable wiring, and reactor-vessel embrittlement and cracking. It seems quite inappropriate, therefore, to consider extending an operations license for a reactor shut down so long ago, for such problems. The NRC should, instead, require full remediation of all technical and design problems which have placed safety operations at risk in the past. The Agency should allow provisional re-start of Unit 1 under its current license, at best, or under new-license standards. Public protection would seem to demand that the NRC closely monitor and evaluate the operation of Unit 1 after re-start and grant license extension only after its performance has proved safe.

We have strong concerns regarding nuclear power plant impacts on the region's water resources. Reactors like those at Browns Ferry consume through evaporation about 20,000 gallons per minute; their flow-through rate exceeds 600,000 gallons per minute and their direct and indirect cost to the water resource exceeds 50 gallons per each kilowatt hour of electricity they generate. Through impingement and entrainment, and through thermal alteration of returned water they cause damage to aquatic life, including great fishery and related recreational losses along river systems on which they are located. Since construction of the Brown's Ferry plant some four decades ago, Tennessee and the region have experienced enormous growth in population, with corresponding demands on water--our most important and life-necessary natural resource. In several pieces of legislation over the last three years, our state has recognized the reality of limitations to the capacity of the Tennessee River system to withstand ever growing water withdrawals. Given their huge withdrawal demands, it is imperative that the NRC consider the water impacts from the Browns Ferry reactors in a comprehensive way and from the perspective of all human and wildlife needs and all competing uses over the longer-term future. Possible threats to water security in the region under various climate-change scenarios must also be considered in this context. We believe, therefore, that committing to electricity generation such large water withdrawals as are needed for safe operation of the Browns Ferry reactors, for more than three decades hence, may not be wise when generation options which have no or minimal impacts, e.g. from renewable sources, are available.

Somewhat related to the above, we urge a comprehensive Environmental Impact Statement before Unit 1 re-start and license extension decisions for Units 2 and 3. The EIS should critically examine (I) the need for the proposed license actions, especially in light of absence of a current Integrated Resource Plan by

the TVA. It should thoroughly assess and clearly delineate (2) the alternative options and their economic, environmental and social benefits and costs. Delineation of alternatives should include optimization of energy efficiency technologies, energy conservation, and Green-Power-Switch program maximization. The EIS should include (3) analysis of aquatic wildlife and terrestrial species impacts, with extensive involvement of the federal and state agencies charged with natural resource protection. It should also include comprehensive assessment and

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comparison of normal (4) safety-related costs for nuclear plants relative to alternative, renewable-source generation options, and (5) the safety related costs arising from today's national-security needs.

In the post 9/11 national reality, nuclear installations have become known to be priority targets for international terrorism. This new reality, beyond all other factors demands a re-thinking of the way our energy future should be shaped and of the role of inherently dangerous technologies such as nuclear power, in this future. The NRC must review in every respect these safety implications and costs of nuclear-power sources as against the societal and environmental advantages which renewable and substantially risk-free generation sources offer. In our view, the immense new security threats which nuclear plants--especially of design and age such as at Browns Ferry--pose to our region argue against expansion through re-opening/re-licensing of Unit 1 and against 20-year extension beyond the next decade, for the other units. We so urge the Nuclear Regulatory Commission, i.e. against expansion and long-term license renewal, at this time.

Thank you for considering comments from the League of Women Voters of Tennessee.

Sincerely,

Frances Lamberts, Natural Resources Co-Chair

League of Women Voters of Tennessee

C: Sharon S. Fidler, President, LWV-TN