

From: "Earl Gustafson" <gustafson@wipapercouncil.org>
To: <PointBeachEIS@nrc.gov>
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Subject: Point Beach Nuclear Power Plant License Renewal

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Division of Administrative Services
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U.S. Nuclear Regulatory Commission
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The Wisconsin Paper Council supports license renewal for the Point Beach Nuclear Power Plant, owned by Wisconsin Energy Corporation, and operated by the Nuclear Management Corporation.

The Wisconsin Paper Council is the trade association representing the pulp, paper and allied industry in Wisconsin. Organized in 1950, the Paper Council is comprised of 27 Regular Members who are manufacturers of pulp, paper and paperboard products, and approximately 110 Associate Members who are suppliers of goods and services to the industry.

Information provided to us by Wisconsin Energy, and data that are available through various public records, highlight the importance of license renewable for this major electricity-generating facility. Rated at 1,036 megawatts, it represents approximately 24% of the output of Wisconsin Electric Power Company - which is Wisconsin Energy's regulated electric utility - and approximately 16% of the total electrical output by all utilities in the state. The plant has been a safe, consistent producer of economical power for the utility's customers; the continued operation of its two units for another 20 years will be a significant benefit to Wisconsin's economy.

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License renewal is expected to cost \$22 million which Wisconsin Energy projects to be \$474 million more economical than other options, such as building a new fossil fuel plant or purchasing replacement power. Additionally, Wisconsin is addressing serious electric reliability challenges - both in generation and transmission - at the same time that developments related to the Midwest Independent System Operator are causing substantial concerns about the ability of the state to access reliable, affordable electricity in coming years. Point Beach's output thus will be vital to the state in meeting in-state demand and supporting the grid during this critical period for retail customers in Wisconsin.

Finally, papermaking is a very energy intensive process. Although Wisconsin's paper industry has reduced the amount of energy consumed per ton of production by more than 30% in the past 25 years - and increased its use of recovered and renewable energy from 17.5% to 26% of its energy mix - it presently requires approximately 16.5 trillion BTUs of electricity annually. Individual paper companies purchase \$3.5 million to more than \$12.0 million of electricity annually. Electricity accounts for 15 percent to 20 percent of the average pulp and paper manufacturer's energy needs, and generally is utilized in process and environmental protection applications for which there is no practical alternative. At the same time, Wisconsin's papermakers have experienced the most intense period of regional and worldwide market competition, simultaneous with the worst economic downturn, in the industry's 156 year history in the state. Those conditions emphasize the importance of the Point Beach nuclear power plant in helping Wisconsin's paper industry meet its electric load requirements.

The Point Beach Nuclear Power Plant is a reliable, low-cost generator of electricity; license renewal will be significantly more economical than replacement alternative; the continued operation of the facility is vital to electricity consumers in Wisconsin Electric Power Company's service territory and the entire state; thus the Paper Council respectfully urges the Nuclear Regulatory Commission to proceed with license renewal.

Earl Gustafson
Energy/Projects Manager
Wisconsin Paper Council
250 North Green Bay Road (54956)
P.O. Box 718
Neenah, Wisconsin 54957-0718
P: 920-722-1500
F: 920-722-7541
E: gustafson@wipapercouncil.org

CC: <rdomrois@tngus.com>, "Norman Davis" <Norman.Davis@ipaper.com>, <bob.kenney@weyerhaeuser.com>, <david.kluesner@ipaper.com>, <tim.laatsch@storaenso.com>, "Tom Scharff" <Thomas.Scharff@storaenso.com>, <schillinger@wipapercouncil.org>, "Terry Shepard" <terrence.shepard@domtar.com>, <craig.timm@domtar.com>, "Bill Ward" <ward.w@pg.com>, <barry.mcnulty@we-energies.com>