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February 24, 2005

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69FR 71854

Chief Michael T Lesar
Rules and Directives Branch MS: T-6D59
US Nuclear Regulatory Commission
Washington, DC 20555-0001

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Dear Chief Lesar,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers.

Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake's level to drop significantly adversely impacting water-based recreational uses of the lake. Also, the increase in the lake temperature, will negatively affect the striped bass, a popular game fish. Waters downstream will be affected similarly.

The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits. The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over \$100 billion.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill trained and ill equipped. Emergency plans for dealing with an accident or terrorist attack are inadequate.

In light of these concerns, and for the health, safety and economic well being of fellow citizens, I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Sincerely,

Anne McGurk

Anne McGurk
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ESP Review Complete
Templates = ADH-013

E-RFDS = ADH-03
All = J. Cushing (JXC9)
A. Wilkinson (AW1)