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69 FR 71854*

cc: President George W. Bush
Governor Mark R. Warner
Senator George Allen
Senator John Warner
Congressman Virgil H. Goode Jr.

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Dear Sir or Madam:

I would like to comment on report number NUREG-1811, which is a draft Environmental Impact Statement for an Early Site Permit at the North Anna ESP Site in Louisa County, Virginia.

As a citizen living in neighboring Albemarle County, I am strongly opposed to building additional nuclear reactors in Louisa, or anywhere else in the country. I understand that the technology to extract electricity from nuclear energy has been designed so that the risk of an accident is calculated to be very low. However, the results of such an accident would be so devastating that to me it falls in the category of risks that are not worth taking. My concerns about increasing Virginia's and America's reliance on nuclear energy are based on the effect of mining for uranium on the environment and on foreign policy, the possibility of an accident within the power plant, risks relating to transportation of radioactive material to and from the plant, the need for foolproof long-lasting waste containment, and the chance for terrorists to take advantage of any of those steps.

To begin, I'd like to address the source of the uranium, as reported on page 292 of the Environmental Impact Statement, section 6-4:

"Another change is the elimination of the U.S. restrictions on importation of foreign uranium. The economic conditions of the uranium market now and in the foreseeable future favor full utilization of foreign uranium at the expense of the domestic uranium industry. These market conditions have forced the closing of most U.S. uranium mines and mills, substantially reducing the environmental impacts in the U.S. from these activities."

This statement raises two concerns. First, if we build additional facilities at North Anna, we are exacerbating our dependence on foreign fuel, merely replacing oil with uranium. This will not allow us the upper hand we strive to have in foreign policy. Second, the statement says that using foreign sources of uranium substantially reduces the environmental impacts in the United States. This means that we are simply shipping environmental problems to other countries for other people to deal with. If the negative environmental impacts of uranium mining are not something we wish to impose on our own citizens, we should not feel comfortable imposing them on other members of the human race. This is callously conveying disrespect for the health and quality of life desired and deserved by all human beings. Additionally, it will lead to another reason for people in other countries to resent the United States of America, creating more antagonism, and therefore more difficulties in foreign policy.

I would also like to address how the Environmental Impact Statement analyses the risk of cancer caused by radiation exposure at North Anna. On page 301 of the draft, in section 6-13, the report covers the assumptions made in calculating the risks:

"The cancer risk factors, used in this analysis, are from the BEIR-V report, 'Health Effects of Exposure to Low Levels of Ionizing Radiation' (National Research Council 1990). In this report, it is estimated that 'if 100,000 persons of all ages received a whole body dose of 0.1 Gy (10 rad) [roughly equivalent to 10 rem] of gamma radiation in a single brief exposure, about 800 extra cancer deaths would be expected to occur during their remaining lifetimes in addition to the nearly 20,000 cancer deaths that would occur in the absence of radiation.' Therefore, even with a large exposure (i.e., twice the annual dose limit for workers), the cancer mortality would change by less than a percentage point (i.e., from 20% to 20.8%)."

My objection here is not how the calculations were arrived at, but how the results are considered. Granted, less than one percentage point sounds low on paper, but one must consider the size of the population.

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*add = J. Ensbury (JXC9)
A. Williams (ARW1)*

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Furthermore, there is a huge difference between considering less than one percent when one is thinking about profit margin and when one is considering the number of new cancer cases. Supposing you do have a population of 100,000 people. What sort of justification is it to say, "Well, 20,000 of them are going to get cancer anyway, so what's another 800?" We are talking about 800 additional families suffering from preventable tragedies. In this light, less than one percent is unacceptable. Now, the report did say that this is assuming an amount of radiation that is twice the annual dose limit for workers. However, let's consider that workers will work at the plant for many years. How does that change the radiation exposure and subsequent risk of cancer? I also realize that the plant will not have 100,000 workers. But let's also consider the small possibility that more radiation escapes the plant than we optimistically expect, either because calculations are wrong, or because of a plant malfunction. Then you are dealing with a potential population of much greater than 100,000 people, depending on which direction is downwind. I cannot accept that even a small percent of my neighbors could get cancer or worse so that I can turn on my air conditioner in the summer. Can you?

Let us consider how the waste from the plant is to be stored. I think the term "stored" is much more accurate than "disposed of," considering the half-life of the waste we are dealing with. I would hope that no additional plants would be built until Yucca Mountain has gone from being a potential site for new waste to an approved, ready-for-use site, so we would not be generating additional waste only to find we have nowhere to put it. This is not to say that I think Yucca Mountain is a great solution for our radioactive waste, nor do I have a better suggestion. The EPA notes that Yucca Mountain is on an active seismic region with several volcanic cones and at least thirty-three earthquake faults in the vicinity. With the half life we are dealing with, we are asking our descendants for many generations to come to manage our waste and pay the price if it does leak. I do not want to place that burden on future Americans. Can we really be sure that Yucca Mountain is as sound as we think it is for thousands of years to come? How many other times have we been overconfident in the safety of our technology? DDT and CFC's come to mind as examples of technologies we thought were risk-free but turned out to lead to increased health problems. We must find a different solution to meet Virginia's energy needs, one that does not risk the health of future Americans.

On the topic of waste disposal, a quote from the Environmental Impact Statement caught my eye. On page 303, Section 61.1.6, the report states,

"For high-level and transuranic wastes, the Commission notes that these are to be buried at a repository, such as the candidate repository at Yucca Mountain, and that no release to the environment is expected to be associated with such disposal, although it has been assumed that all of the gaseous and volatile radionuclides contained in the spent fuel are released to the atmosphere before the disposal of the waste."

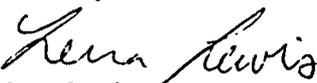
I am alarmed that volatile radionuclides will be released into the atmosphere as a matter of standard practice.

Finally, I would like to express my concern over creating additional potential targets for terrorists. If we build more nuclear reactions in North Anna, that may increase how attractive it looks to terrorists, especially given its proximity to Washington, DC. Every transport of radioactive waste from North Anna to Yucca Mountain on our nation's highways is an additional opportunity for terrorist action. I am confused by our President's repeated statements that terrorists are considering targets such as nuclear facilities, followed by statements that the future of America's energy needs lies in nuclear energy.

The most patriotic thing our country can do to meet our energy needs is to commit our nation's best minds to developing highly effective renewable energy technologies. This would free us from dependence on other countries for fuel supplies, and would keep our own citizens healthy by reducing air pollution and possible increased radiation exposure. Americans are worth that effort.

Thank you very much for your time and consideration, and thank you for all your hard work on behalf of our nation.

Sincerely,



Lena Lewis