

RDB received

3/9/05

From: "Freeman, Sarah" <freemans@ymcarichmond.org>  
 To: <NorthAnna\_ESP@nrc.gov>  
 Date: Mon, Feb 28, 2005 1:35 PM  
 Subject: Concerns about DEIS for Dominion's Early Site Permit at North Anna

(630)

12/10/04

69 FR 71854

As a resident of Richmond, Virginia and a citizen of the United States, I have many concerns about Dominion's ESP and the DEIS prepared by the NRC. I am significantly concerned about the process the NRC has accepted to review new permits for nuclear reactors, and see clearly that the issues NOT included for consideration (such as where toxic nuclear waste will be stored) skew the process away from an honest discussion about the future of nuclear power in the US.

I will, however, restrict my comments here to the DEIS:

1. I hold a B.S. in Geology from The College of William and Mary and have studied the environmental and seismic features of the Commonwealth of Virginia. I cannot understand why seismic activity in the Lake Anna area was ruled out from the DEIS process. NRC material indicates that seismic features are to be considered in an EIS for an ESP. Given the earthquake of last year, and the number of faults in this area, it is irresponsible to exclude consideration of seismic features at the North Anna site.
2. The Chesapeake Bay and its watershed are very important natural resources for the Commonwealth of Virginia. Pollution and overfishing have had negative impacts on the Bay that we are only now beginning to address and correct. The effect of decreases in lake levels of Lake Anna or increases in temperatures, particularly during drought years, due to more nuclear reactors has not been thoroughly considered for its potential effects on the Bay and its watershed.
3. While the DEIS points out that drought years have not had significant impact in the past on Lake Anna's water levels, the potential for global warming should be considered. This is especially true because the ESP is valid for 20 years with the possibility to renew for 20 more. Nearly all scientists agree that some effects of climate change will be experienced in the next 20 years. The DEIS has not yet considered what would happen to the lake under the various conditions that could be caused by global climate change.
4. The discussions of potential radiation hazards to humans living near Lake Anna are not clear enough in the EIS. The document simply cites studies that are in the interest of Dominion without a discussion of why these particular studies are more scientifically credible than those indicating that nuclear reactors do cause radiation damage to the human community around a reactor. It is not scientifically appropriate to simply choose a particular set of studies without showing why.
5. It is clear in the DEIS that the no-action option was not seriously considered. The document basically summarizes it this way: There is no real environmental impact to an early site permit because an early site permit doesn't allow for the building of a nuclear reactor, therefore, a no action option is equally harmful to choosing a site. If this indeed is true, that an ESP doesn't allow for any environmental damage, why did you have one completed and waste taxpayer money and paper to prepare such a document. Either an ESP has an environmental impact or it doesn't. If it does, then you must more seriously consider the no action alternative.
6. One of the sites has fewer impacts than the site at North Anna and yet the DEIS recommends that the ESP be granted to Dominion. I fail to understand how this could be the case. If the point of the EIS is to determine if North Anna is the least damaging place to allow for an ESP, why would you recommend approval when there is an alternative site that would have fewer deleterious effects.

Thank you for seriously addressing the concerns above in your next EIS for the North Anna ESP.

Sarah Craig Freeman  
 Director of Annual Giving  
 YMCA of Greater Richmond

E-RIDS = ADM-03

Add J. Cushing (JXC9)

A. Williams (ARW1)

SISP Review Complete

Template = ADM-013

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**From:** "Freeman, Sarah" <freemans@ymcarichmond.org>

**Created By:** freemans@ymcarichmond.org

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