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From: <tonijackson@comcast.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 9:47 PM
Subject: Oppose North Anna Nuclear Reactor

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. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

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 (Orange and Red level) 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, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. 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. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

ERDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

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. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we 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.

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