

From: <ironekilz@hotmail.com>
 To: <northanna_esp@nrc.gov>
 Date: Tue, Mar 1, 2005 7:34 AM
 Subject: DENY Dominion's application for an Early Site Permit

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(670)

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 69 FR 71854

Dear US Nuclear Regulatory Comm,

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. 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.

Why are we considering building new nuclear reactors? This is a step backward. Do you remember Three Mile Island? Chernobyl? Nuclear reactors are not safe due to potential accidents or incidents of terrorism. Al Qaeda recently called on its people to plan more terrorist activities outside of Iraq, including more potential violence within the United States. It is a proven fact that Al Qaeda has considered attacks against nuclear reactors.

Besides that, nuclear reactors are expensive. In a time of a nation-wide financial crisis, why are we spending \$200 million to build a nuclear reactor when we can save money by investing in safer, more environmentally conscious and cheaper sources of energy such as hydrogen, solar power and geothermal energy to name a few? Currently Virginia has a surplus of energy, so a new nuclear power plant would generate energy which would likely be sold out of State, thereby increasing the risks to Virginians without any benefits.

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 and will raise water temperatures harming game fish. In addition, lowered water levels will result in lowered property values for those whose houses overlook the lake.

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.

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. Exposures on national news show that reporters can easily walk right into nuclear facilities and be there for long periods

ERDS = ADM-03

Add J Cushing - (Jxcg)
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SISP Review Complete
 Template = ADM-013

of time before a guard even approaches them, plenty of time to detonate a bomb.

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.

Sincerely,
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