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**To:** <ClintonEIS@nrc.gov>, <neis-board@yahoogroups.com>, <simssj@wscn.edu>  
**Date:** Fri, Apr 29, 2005 3:53 PM  
**Subject:** MY MORE DETAILED COMMENTS--CLINTON DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) HEARING (Tues., 4/19/05)

On Tuesday, April 19, 2005, I testified at the U.S. Nuclear Regulatory Commission (USNRC) Hearing at Clinton Junior High School, 701 Illini Drive, Clinton, IL 61727. At that time, I promised to send in more detailed comments. THESE MORE DETAILED COMMENTS ARE IN FAVOR OF DENYING EXELON'S "EARLY SITE PERMIT" (ESP) APPLICATION FOR A SECOND CLINTON REACTOR (Submitted by Exelon to the USNRC on Sept. 25, 2003).

My name is Dennis R. Nelson, and I reside at: 660 N. Dearborn St., Apt. 306, Chicago, IL 60610. I am a Board Member of the Nuclear Energy Information Service (NEIS), a not-for-profit "NO NUKES/SAFER ENERGY" research, education, and advocacy group based in Evanston, IL, which has been active since 1981. Having a Bachelor of Science (B.S.) Degree in Biology and Environmental Studies from Dana College, Blair, NE (1976), my o!

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experience in research/advocacy (education and lobbying)/organizing to solve our environment-energy-resource crisis extends over 35 years (as of around April 22, "EARTH DAY '05").

These comments DISAGREE with the staff's preliminary recommendation to the USNRC that Exelon's "Early Site Permit" (ESP) should be issued for a new nuclear reactor to be sited adjacent to the existing Clinton Power Station (CPS), Unit 1, about 6 miles east of the City of Clinton in DeWill County: ENVIRONMENTAL IMPACT STATEMENT FOR AN EARLY SITE PERMIT (ESP) AT THE EXELON ESP SITE--REPORT FOR COMMENT (NUREG-1815), February, 2005, Division of Regulatory Improvement Programs, Office of Nuclear Reactor

Regulation, U.S.Nuclear Regulatory Commission (USNRC), Washington, D.C. 20555-0001. Part of my remarks are in regards to "8.0 Environmental Impacts of the Alternatives" (starting on p. 333). Probably the USNRC thinks that this is beyond the specific scope of the DEIS, but the NEGATING EFFECT of the proposed Clinton Unit 2 reactor on the state's "political environment" to actively promote truly sustainable appropriate renewable-electric technologies has to be considered.

I will let other NEIS Board Members, along with activists from the local No New Nukes group, address a host of pertinent issues in greater detail: The impacts of the proposed Clinton Unit 2 reactor on the ecology and recreation of Clinton Lake, the national security threat posed by this second reactor as another potential (and attractive) terrorist target, the potential he!

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(epidemiological) effects on the surrounding area's infant mortality rate, the potential risk of a catastrophic radioactivity-releasing accident at Clinton Unit 2, the explicit economic costs (capital costs) and "hidden" economic costs (federal subsidies) of Clinton Unit 2, the capital intensiveness of Clinton Unit 2 making it a "loser" in creating new net employment, the inability of Clinton Unit 2 to help mitigate our global warming problem or reduce our foreign oil dependency, and the poor track record of Exelon (formerly Commonwealth Edison) in running its "nuclear fleet."

The "pronuclear cheerleaders" (especially those at Exelon) are hyping up a so-called "nuclear renaissance" (what they consider to be a "nuclear rebirth" of what I consider to be a FAILED TECHNOLOGY). I say "so-called" because this nonsense is more accurately described!

as a

"NUCLEAR RELAPSE" (like a reoccurring "nuclear nightmare" from a B-science fiction movie where current unresolved difficulties are perpetuated and new problems are created). EXELON SEES THE PROPOSED CLINTON UNIT 2 REACTOR AS A CRUCIAL "TEST CASE" IN THE NUCLEAR INDUSTRY'S CAMPAIGN TO MAKE THIS VERY THING HAPPEN. THE POSITION OF NEIS IS THAT THIS SHOULD NOT BE ALLOWED TO HAPPEN!!!! Probably beyond the scope of what A DEIS is usually supposed to cover, these comments make the case that granting Exelon an ESP will NEGATIVELY IMPACT upon the "political scene" in Springfield. THERE ARE TWO EXAMPLES OF THIS WHICH SHOW EXELON'S TOTAL AND BLATANT ARROGANCE:

First off, the General Assembly has already passed a state moratorium on building any more nuclear power plants until the issue of where to finally put the high-level radioactive waste !

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*E-RIDS = ADM-03*

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settled. Knowing Exelon's arrogance, the company's lobbyists will probably ask the state legislature for an exemption from this nuclear reactor construction moratorium. (Because of weak regulations, bad science, and "pronuclear hanky-panky," NEIS is opposed to Yucca Mountain, Nevada, as the preferred high-level nuclear waste site being backed by the nuclear industry and the Bush-Cheney Administration.) However, my view maintains that this moratorium is SOUND. THE USNRC SHOULD RESPECT THIS VALID "STATE'S RIGHTS ISSUE," AND DENY EXELON'S "EARLY SITE PERMIT." IT IS JUST "GOOD OLE FASHIONED" COMMON SENSE TO SAY THAT BUILDING CLINTON-2 WITHOUT AN APPROVED NUCLEAR WASTE SITE IS LIKE BUILDING A NEW HOME WITHOUT A TOILET.

The second example of Exelon's arrogance is characterized by Exelon CEO John Rowe's pooh-poohing of

renewable resources (such as wind), and Exelon's lobbyists in Springfield fervently opposed to a statewide "Renewable Energy Portfolio Standard (REPS)." Legislation (Senate Bill 2321) is currently pending in the General Assembly which would establish such a REPS. Being THE MOST IMPORTANT renewable energy legislation that could ever be passed HERE, this REPS would set realistic goals to "ramp up" our use of renewably-generated electricity--requiring 3% of our electricity by 2007 to come from renewable sources (solar, wind, and biomass), and then 10% by 2012. THIS "RENEWABLE ENERGY PORTFOLIO STANDARD" SHOULD BE PASSED IN SPRINGFIELD FIRST, BEFORE EXELON'S PROPOSED SECOND CLINTON REACTOR IS EVEN CONSIDERED. In fact, Exelon should be MANDATED to help meet our electricity requirements using these renewable resources. Again, granting Exelon an ESP will help to EFFECTIVELY NEGATE such a REPS on the state level. (Exelon CEO John Rowe and Exelon's lobbyists will probably argue somet!

hing like

this: "Well, we are already going to construct a new reactor near Clinton, so why do we need this 'Renewable Energy Portfolio Standard' too?" As the expression goes, this kind of backward thinking "puts the cart before the horse.")

Continuing on, nuclear power is a major part of our energy problem itself (rather than a solution to it). As someone who has researched the history of nuclear power, I can say that Commonwealth Edison (now an Exelon company) has had an integral role in developing and promoting nuclear power in Illinois and nationwide. [With the current number of nuclear reactors (and the growing quantities of deadly radioactive wastes), the label "NUCLEAR ILLINOIS" is NOT exaggerated activist rhetoric.] This long-time (and big-time) "political stranglehold" by ComEd (and now Exelon) has stifled the fullest practical implementation possible of the best

electricity-saving technologies and well-designed/properly installed renewable energy systems. With the USNRC granting ("rubber-stamping?") an "Early Site Permit" for Clinton Unit 2, this action will merely perpetuate this "political stranglehold." Yet another seemingly insurmountable "political barrier" will be erected to the more widespread use of truly sustainable non-nuclear energy choices throughout our "Land of Lincoln" (where there are no insurmountable technical barriers).

As far as the "letter of the law" (i.e., the National Environmental Policy Act) is concerned, the USNRC is operating within the technical legal parameters when it addresses "alternatives to Clinton Unit 2" in the DEIS just for the local region in downstate Illinois. But using different (broader) assumptions, I have been considering the impacts of Clinton Unit 2 on!

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STATE LEVEL. The environmental impacts of wind turbines, solar photovoltaics, and bioconversion systems ARE LESS than those for nuclear power plants. TO REITERATE, WHEN IT COMES TO AGGRESSIVELY PURSUING THESE APPROPRIATE RENEWABLE ENERGY TECHNOLOGIES (AND THIS GOAL MAKES A STATEWIDE REPS IMPERATIVE), AN ESP FOR CLINTON UNIT 2 WILL HELP TO CREATE A "POLITICALLY STIFLING CLIMATE" FURTHER NEGATING THIS IMPLEMENTATION. Illinois should join the 18 other states that have already adopted thier own REPSs. For example, Colorado voters approved (by 53.4%) a ballot initiative on Nov. 2, 2004, that requires the state's largest utility companies to provide a percentage of their retail electricity sales from renewable sources--3% by 2007, 6% by 2011, and 10% by 2015. This is the FIRST voter-approved statewide renewable energy requirement in our country. [The measure also!

requires

solar power to provide 4% of the renewable energy, and half of that solar power has to be located at customers' facilities. In order to encourage their customers to install solar photovoltaic (PV) arrays, the

electric utilities have to offer a rebate of \$2 per watt for PV systems up to 100 kilowatts in capacity, and must allow the customers' solar power generation to earn credit against their power use ("net metering").] At this point, here is a sample of brief "case studies" showing that wind-electric machines and solar-electric arrays are HERE-AND-NOW CHOICES FOR ILLINOIS RESIDENTIAL RATEPAYERS: ----I had the "golden opportunity" to tour our state's first utility-scale windfarm. On April 1, 2004, I took a coach bus tour to th!

e MENDOTA

HILLS WINDFARM. This is located about 80-100 miles west of Chicago in Lee County. The MENDOTA HILLS WINDFARM has 63 large wind turbines. Their total capacity is 50.4 megawatts. MENDOTA HILLS will deliver enough electricity each year to power 15,000 homes. Consisting of 31 landowner parcels, the windfarm is spread out over 2,600 acres of farmland. Each farmer signed a 45-year lease with the Gamesa windpower company. The farmers are paid between \$3,000-\$5,000 a year for each wind turbine on their land. This is additional income for them. They can farm beneath the turbines at the same time. [Wind power now generates electricity at 4 cents per kilowatt-hour (kwh)--now competitive with Exelon's nuclear power plants. With the reliability and performance of wind turbines continuing to increase: The cost will decrease to between one-and-one-half cents per kwh-2 cents per kwh in 10 years. Then wind power will compete with inexpensive hydro.] !

----Living in an apartment on North Hoyne on Chicago's "North Side," John Berton is an innovative "do-it-yourselfer" who invested his time, energy, and money to make a lifestyle choice in being "solar independent." According to Mr. Berton: "In May of 1999, I became the first person in the city of Chicago to live off the grid. My local utility, Commonwealth Edison (ComEd), became my backup power source. A huge percentage of their power is produced by nuclear plants. There is no solution to the problem of nuclear waste, and production of the fuel is inextricably linked to production of nuclear weapons. I don't want to be part of either of these." He accomplished this goal by using solar photovoltaic panels (and nickel-iron batteries for storage) to do three things: (1) Generate his electricity for lights, power tools, appliances, computer equipment, etc.; (2) Heat his water; and (3) Keep his living s!

pace

warm. John Berton also reduced his electrical use as much as possible with a highly efficient Sun Frost refrigerator, more efficient compact fluorescent light bulbs, and so on. [Special Note: Again, Commonwealth Edison (ComEd) is now an Exelon company.]

----Stelle, Illinois, is a small unincorporated rural town of about 110 people located roughly 60 miles southwest from Chicago. Stelle is near the end of Exelon's distribution line. As a result, the residents of Stelle were plagued by frequent power interruptions and outages. Because of this, they have used solar photovoltaics and wind turbines to make their electrical system more reliable. The town of Stelle has one of the highest per resident concentrations of solar and wind technologies in North America. [More than a third of the homes in Stelle have some (or all) of their electricity !

provided

by solar photovoltaics. There are 20 renewable energy systems on only 40 acres of land. (Stelle is 200 acres.)] In the summer of 1998, Stelle telephone became the world's first "off-the-grid" solar-powered Internet service provider. All of the phone calls made from homes there are powered by solar electricity. A wind turbine provides some of the electricity for the municipal water plant. Another smaller wind generator supplies most of the electricity for a resident's house. Another Stelle resident has a solar photovoltaic system that provides all of the electricity for the tools in his workshop.

----Environmental Resources Trust (ERT), Inc., a national not-for-profit organization in Washington, D.C., launched a project to build 100 solar PV-oriented houses throughout Chicago. The original plan was to construct the first ten homes in the fall of 2003, and then h!

ave all

of them done by last year. An Update: Because of delays, the ground was just recently broke on the first seven of 15 solar PV homes (this ceremony at Karlov and Maypole Avenues was on Wednesday, April 27, 2005). The other eight houses will be started sometime this summer. Being constructed so they can be bought by low- and moderate-income families, these affordable houses will provide them with more than 80% savings in their average home energy costs (contributing to the affordability of their household costs over time). Special "net metering" equipment will allow all 100 solar houses to be interconnected to the power grid and to sell surplus electricity back to Commonwealth Edison. More specifically, the SmartRoof

PV system by the United Solar Ovonic Corporation (Uni-Solar) consists of lightweight, durable thin-film solar shingles, and is being used on the homes to generate over 300 megawatt-hours annually. (Mayor Richard Daley has committed to buy 20% of the "Windy City"

government's electrical supply from renewable resources by this year.)

In conclusion, the initials "N...R...C" obviously mean "Nuclear Regulatory Commission." This time, let's make sure that the "R" also means "Responsible," and NOT "Reassurance." THE NRC SHOULD "GET RESPONSIBLE," AND NOT MERELY "RUBBER-STAMP" EXELON'S "EARLY SITE PERMIT" APPLICATION FOR AN UNNEEDED SECOND CLINTON REACTOR. (I ask that my written comments be included in the official record.) Thank you. DENNIS R. NELSON, BOARD MEMBER, NUCLEAR ENERGY INFORMATION SERVICE (NEIS), P.O. Box 1637, Evanston, Illinois 60204 (Office: 845 Chicago Avenue, #207, Evanston, IL 60202).

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When compared with both nuclear and coal power stations, renewable energy technologies remain the clear environmental choice!

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