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PAT DRESSLER
473 WEST JULIA WAY
HANFORD, CA 93230

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Nuclear Regulatory Commission
Chief, Rules Review and Directives Branch
Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Re: Federal Register: March 10, 2005, Page 12022

Nuclear Regulatory Commission:

Comments on NUREG-1815, Draft Environmental Impact Statement for an Early Site Permit at the Exelon ESP Site

The draft Environmental Impact Statement (DEIS) for Exelon's Early Site Permit (ESP) application is incomplete for a variety of reasons. First, it avoids consideration of important siting factors. Specifically, the need for power in the central Illinois region was not examined, nor did NRC do a proper analysis of the ability of a combination of renewable energy technologies to meet any power needs. These issues will supposedly be dealt with at a later permitting stage, but they are more properly examined early in the siting process.

The United States Environmental Protection Agency (EPA) found NRC's approach flawed, claiming that "since it ignores the justification for the power plant addition in the early stage of project development...[it] biases the subsequent energy alternative analysis toward nuclear power." According to the U.S. Department of Energy, Illinois already exports approximately 18% of the electricity generated in the state; additional generating capacity is unwarranted.

As for alternatives, it is unacceptable to allow Exelon to define the project goals so narrowly that only nuclear power can achieve them; for instance, requiring that any alternative be constructed in the immediate vicinity of the proposed ESP site and provide baseload power unfairly precludes consideration of less polluting and less dangerous energy sources such as wind. If sufficiently distributed geographically, and combined with other forms of renewable energy generating technologies and conservation/ efficiency measures, there are economic alternatives to nuclear power that can meet our energy needs without falling victim to the intermittency problem cited in the DEIS. An analysis by the Union of Concerned Scientists found that Illinois has the technical potential to generate up to eight times its current electricity needs through renewable sources; NRC should examine UCS's methodology and perhaps modify its conclusion that renewable energy resources are incapable of providing reliable power.

Other important factors, such as waste, are ignored altogether. Given that the proposed Yucca Mountain repository is a long way from ever opening, and that even if it does it will not have the capacity to accept waste from a new reactor at Clinton, waste concerns must be taken into consideration. No analysis of whether the site is suitable for indefinite storage of high-level waste is included in the DEIS.

NRC also fails to consider the security implications of expanding the Clinton nuclear site. It is well known that nuclear plants are considered prime terrorist targets. However, the Clinton plant, like all Exelon-owned plants, is guarded by the private security firm Wackenhut. Wackenhut also has a contract to test security at all the country's nuclear plants, posing a tremendous conflict of interest. Without an unbiased system for testing security, the actual level of preparation by guards is unknowable, and this gap in our knowledge should be enough to preclude further

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reactor construction. If the NRC will not remove Wackenhut from testing duty, it should take this conflict of interest-and the security questions it raises-into account.

The DEIS is also incomplete in its analysis of the effects a new reactor will have on Clinton Lake, the only source of cooling water for the existing and proposed reactors. The DEIS does note that "the consumptive water loss to the atmosphere from the cooling tower of a new nuclear unit could lower the water levels of the lake significantly during times of drought. This could impact both boating (lower water levels) and fishing (lower water levels and elevated temperatures) at the lake." However, it fails to note that drought conditions in the Midwest are predicted to become more prevalent in coming decades due to climate change. This must be factored into the lake impact analysis. It is also unacceptable that the new reactor's effect on lake temperature remains undetermined; temperature has a direct impact on water levels, enjoyment of the lake for recreational purposes, and its acceptability as habitat for various animal species. This should be rectified before granting the ESP.

Finally, NRC should reconsider the validity of its EIS in the context of its decision to grant an ESP valid for twenty years. The EPA noted in recent comments that "the twenty year horizon allotted under the proposed ESP does not have any protective assurance that unforeseen population growth and/or additional stressor on the Air or Water resources will be accounted for. Typically an action that has not occurred within three years of an EIS requires at minimum a supplemental EIS." I urge NRC to take EPA's advice.

Thank you for considering these comments; I look forward to your substantive response.

Sincerely,

Pat Dressler