

From: Julie Risser <julie.risser@visi.com>
To: <MonticelloEIS@nrc.gov>
Date: Mon, Aug 1, 2005 8:52 AM
Subject: Statement re: relicensing the Monticello Nuclear power plant

4/2/05
70 FR 32381

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Below is my statement regarding the License Renewal of the Monticello Nuclear Generating Plant. I have attached this statement as well. Thank you for considering my concerns,

Julie Risser
6112 Ashcroft Avenue
Edina, MN 55424
952-927-7538*

Statement for the U.S. Nuclear Regulatory Commission

*Regarding the Matter of Environmental Impact Statement (EIS) for License Renewal at the Monticello Nuclear Generating Plant *

August 1, 2005

Julia A. Risser

Edina, Minnesota

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2005 AUG -2 AM 9:39

RULES AND DIRECTIVES
BRANCH
US-NRC

I have divided my comments into two sections: Public Involvement in the EIS Scoping Process and Environmental Concerns.

Public Involvement in the EIS Scoping Process - Summary:

Because the scope of public outreach was limited to Buffalo, Minnesota and Monticello, Minnesota the Nuclear Regulatory commission (NRC) failed to provide residents of other effected communities with information and opportunities to participate in the EIS Scoping process; people were denied the chance to weigh in on whether or not the Monticello nuclear power plant should be relicensed. Furthermore the NRC appears to have intensionally undermined the process for allowing the public to participate at the public meetings that it did hold in Monticello to discuss the EIS Scoping.

Specifics:

The Monticello nuclear power plant is located upstream from the Twin Cities on the Mississippi River. Residents of Minneapolis, St. Paul, as well as substantial numbers of people who live in sections of first-ring suburbs such as Edina get their drinking water from the Mississippi. Relicensing Monticello will result in more spent nuclear waste being generated near this valuable water resource. The residents of the Twin Cities Metro Area have a vested interest in this resource - it is a fundamental component of their survival - and they need to be included in public discussion about license renewal for Monticello.

SISP Review Complete
Template = ADM-013

E-REDS = ADM-03
Add = S. Lee (SSL1)
J. DAVIS (JXD10)

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During the EIS Scoping period the NRC failed to provide libraries in the Twin Cities Metro Area with any documentation regarding the license renewal for Monticello; the NRC made this documentation available only at public libraries in Buffalo and Monticello.

People who learned about the Open Houses were instructed to contact Jennifer A. Davis 301-415-3835 or Jason Flemming 301-415-5787. I called Jason Flemming long-distance and left messages twice. Jason Flemming never returned my calls even though I clearly stated in both messages that I wanted to participate in the Monticello Open House as a concerned member of the public.

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The NRC failed to provide people with a toll-free number so they

could learn about the forum; public comments are likely to be skewed toward views of the middle-class and wealthy – the poor were not provided a means to participate in this basic dialog.

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The NRC failed to provide people with contacts who would respond to their questions in a timely way; the NRC undermined the ability of the public to participate.

People who were able to make it to the June 30th Open House in Monticello were given a handout “Welcome to the NRC’s Open House Associated with the Environmental Review for License Renewal at the Monticello Nuclear Generating Plant” that clearly stated in the first sentence of the second paragraph that the NRC was seeking comments supporting relicensing: “The NRC is gathering information necessary to prepare an Environmental Impact Statement (EIS) /in support of/ the proposed renewal of the operating license for the Monticello Nuclear Generating Plant” (I have added the italics). This sentence alone may have discouraged members of the public who showed up intending to make a statement against the relicensing from voicing their concerns or entering them into the record.

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In the “Welcome to the NRC’s Open House Associated with the Environmental Review for License Renewal at the Monticello Nuclear Generating Plant” the first sentence of the second paragraph makes it clear that the EIS Scoping period was not a time for the NRC to consider the pros and cons of relicensing; for the NRC it was a time to gather information that supported a predetermined course of action – relicense the plant.

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During the meeting members of the public were told that demand for electricity would rise by 2% annually. The NRC did not clarify that this figure may be inflated; the Minnesota Department of Commerce projects a 1.6% load growth as the median forecast for electricity demand. In short the NRC may have skewed data to make it appear that the need for plant relicensing is greater than it actually is.

Undermining Public Involvement in the EIS Scoping Process - Conclusion:

Because the NRC failed to inform large communities that will be effected by the relicensing of Monticello about the EIS Scoping, because the NRC did not demonstrate a credible effort to engage members of the public in the EIS Scoping process, and because the NRC appears to have consciously set out to undermine participation from members of the public who are against the relicensing of Monticello the entire EIS Scoping Process needs to start over. To fail to do so will result in damage to Xcel Energy’s reputation and damage to the credibility of all relicensing efforts for nuclear reactors throughout the United States. At this point

in our nation's history undermining the democratic process for something as serious as relicensing nuclear power plants could have significant and harmful negative fallout as far as public confidence in the government's ability to put the long-term needs of the people before corporate desires for profit and gaining market share is concerned. Failure to engage in honest dialog regarding relicensing the plant creates the very real possibility that Monticello will be relicensed without the public or the NRC considering very serious problems; this is public policy at its worst.

Environmental Concerns – Summary

Extending Xcel's license to operate the Monticello Nuclear plant for 20 more years will result in 25 more dry cask storage containers of spent nuclear fuel along the banks of the Mississippi; contact with spent nuclear fuel can be fatal – renewing the license to operate puts people in danger. Extending operations at Monticello for 20 more years will also mean more cancer-causing radiation emissions will be pumped into the atmosphere. Extending the license to operate until 2030 will mean future generations will have to spend valuable resources safeguarding and storing more spent nuclear fuel; this is hardly beneficial to environmental resources.

Specifics

As with problems surrounding public involvement, problems surrounding environmental concerns reveal broad segments of the population have been ignored by the NRC. The NRC relies on studies that assume a healthy adult male who weighs approximately 150 pounds is the recipient of radiation emissions. The NRC also fails to address how low-income people in the Twin Cities Metro area would be able to procure safe drinking water in the event that the Mississippi River became contaminated by nuclear material.

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The NRC does not consider how radiation effects women, children, developing fetuses, the elderly, people with immune deficiency problems, people who are obese, and people who are underweight. The studies of radiation used by the NRC reveals a clear discrimination against well over 50% of the population; it is sexist, ageist, and elitist. On this latter point subjects are assumed to be healthy, i.e., individuals who have the resources to care for their bodies and their diets.

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The NRC does not consider long-term radiation exposure. It does not weigh basic facts about human physiology. For example girls are born with all of their eggs intact. What is the effect of long-term exposure to human eggs? Will there be decline in human health and abilities over the next two to ten generations?

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The NRC does not have a plan to provide water to residents who live down-stream from the Monticello nuclear power plant; the Twin Cities Metro Area is not considered part of its scope.

Generating electricity from nuclear material requires tremendous amounts of energy to process the uranium. Much of this electricity comes from coal plants which produce high levels of global warming carbon dioxide and high levels of mercury emissions which ultimately end up in human bodies; the EPA now estimates that one in six pregnant women have levels of mercury in their bodies high enough to jeopardize the development of the fetal nervous system.

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The NRC makes no provisions to ensure that the energy needed to process uranium, and extract uranium is generated by sources such as wind or solar that do not produce harmful mercury, carbon dioxide, and nitrogen oxide emissions.

Remaining dependent on nuclear power puts Minnesotans at risk for bearing the environmental and economic costs of maintaining toxic waste for centuries; the economic cost of maintaining this waste outweighs the value of the energy generated by it.

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The NRC fails to acknowledge that there is no way to access accurately the true cost of securing and storing spent nuclear fuel for future taxpayers. Such an exercise is futile as there is no way to know how strong future economies will be.

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The NRC fails to acknowledge that a large percentage of our financial resources will be diverted from other areas in order to provide financial resources for securing nuclear facilities and storing nuclear waste.

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The NRC fails to acknowledge the fragile political nature of Minnesota's present State government. Minnesotans are experiencing government cutbacks and recently Minnesotans experienced an unprecedented State government shutdown; Minnesota lacks the stable economy and political climate necessary to bear the responsibilities of nuclear power plants and spent nuclear fuel.

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The NRC fails to acknowledge that the number of people needed to effectively address release of toxic substances is lower than it would have been before the September 11th terrorist attacks. The NRC has failed to determine how it can make up for this short fall and what it intends to do if numbers of reservists present in the

state continue to decline. Many members of the National Guard are not in Minnesota – they are serving our country in an ongoing war with Iraq and an ongoing peace-keeping mission in Afghanistan. If indeed there was an accident at Monticello, a fire, or other emergency it is questionable whether Minnesota would have enough individuals with the training and the knowledge needed to effectively address the catastrophe.

The NRC analysis on water quality and surface runoff fails to adequately address issues concerning erosion, changing weather patterns we are experiencing in Minnesota, and the risks to ground water contamination.

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The NRC does not address the fact that while torrential down pours followed by days of hot dry weather used to be unusual in the state ten years ago, they have become common; cities are scrambling to address rapidly changing water levels that fluctuate from unusually high to unusually low.

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The NRC has failed to adequately address risks to ground water contamination. According to the NRC's own study the soils at the Monticello site are primarily Hubbards which are highly permeable and also have limited available water capacity. These soils readily transmit rainwater and surface water to groundwater supplies. In the event of radio-active material seeping out of containment units it is quite likely that groundwater sources and even aquifers could become contaminated.

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The NRC fails to acknowledge that the soils at Monticello are highly susceptible to wind erosion which could also lead to problems with storing spent nuclear fuel in containers on a cement platform, i.e., cracking and buckling of the cement platform.

Environmental Concerns – Conclusion

Given the location of the Monticello plant – upstream from a densely populated urban area, the fact that Minnesota's current economic and political climate is weak, the fact that political leaders from the two major parties cannot function adequately to keep the government running under normal circumstances, and the fact that the soils at Monticello raise the prospects of groundwater contamination, it is clear that relicensing Monticello is inappropriate and irresponsible at this time. The NRC should reject Xcel Energy's application for license renewal.

Mail Envelope Properties (42EE1ADE.E8A : 24 : 24202)

Subject: Statement re:relicensing the Monticello Nuclear power plant
Creation Date: Mon, Aug 1, 2005 8:51 AM
From: Julie Risser <julie.risser@visi.com>

Created By: julie.risser@visi.com

Recipients

nrc.gov
owf4_po.OWFN_DO
MonticelloEIS

Post Office

owf4_po.OWFN_DO

Route

nrc.gov

Files	Size	Date & Time
MESSAGE	14382	Monday, August 1, 2005 8:51 AM
NRCEISstatementrisser.doc	46080	
Mime.822	79277	

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard

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