

6/2/05
70 FR 32381

From: "Envirocoord" <ec@secomo.org>
To: <MonticelloEIS@NRC.gov>
Date: Tue, Aug 2, 2005 6:58 PM
Subject: Comments on EIS scoping, PUC docket 04-87-CON-Monticello

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Responsible Party,

My comments will be brief with respect to the Environmental Impact Scoping (EIS) document and PUC docket 04-87-CON-Monticello and focusing on making sure that community impacts are carefully weighed and include impacts to the greater metro community in the event of a release or attack on the power plant. Since neighborhoods in Minneapolis would likely be affected in the event of an accident or release, and due to the fact that power generation in a community like Monticello is largely serving population centers like this one, we are commenting on the scoping document. Additionally, due to the fact that a long-term storage facility is unlikely to be built anytime soon, and that facility will not have room for additional waste from Monticello, this issue will be affecting generations of Minnesotans and metro residents.

Particular areas of general concern that have been removed and should be addressed in the scope of the EIS that are of paramount concern to the community at large are (Section IV.)

- 2) Radiation and Safety,
- 3) Storage technology, Accidents & Terrorism
- 6) Transportation of Spent Fuel from Monticello

These sections and others (i.e. Radiation and Radionuclide testing) need to be closely evaluated for their impacts on millions of people who live in the metro area and could be affected (killed) in the event of an accident or act of terrorism. To omit them from the EIS scope would be to prepare an incomplete Environmental Impact Analysis and a misrepresentation of risks to the surrounding communities.

We would also suggest that alternatives to continued operations at the Monticello facility be properly evaluated, particularly part 5 titled "Systemwide Renewable, distributed generation" which could include the construction of wind farms, solar farms, or other renewable energy sources where the fuel is present locally and the method of generation not inherently dangerous. The # four option of "Wind and Gas" would also be a much more benign scenario to continued operations and infinitely long storage of nuclear waste on-site. With the above stated the specific EIS topics that appear to not be addressed fully in the EAW include:

Item 12 & Item 13, Physical Impacts on Water resources, Water Use. Xcel Energy uses water to cool reactors and this topic should be addressed in the EIS, because of the definite and apparent impacts on local aquifers and water resources.

Item 20, Solid Waste, Hazardous wastes, Storage Tanks, section c, "Emergency Response". While there may be no above ground storage tanks of hazardous chemicals it seems reasonable that some mention of the nuclear waste and emergency response measures needed in case of a release should be addressed under this point. To overlook this part in

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the scoping would be equivalent to stating that there is nothing stored at the facility more dangerous than water.

Item 22, Vehicle Emissions. More discussion is needed as this is the only identifiable source of air emissions. Trucks, hauling equipment, and vehicles used to perform ongoing maintenance need to be quantified and compared to USEPA guidelines especially considering the fact that this area is in danger of falling out of "attainment" for ozone. Vehicle emissions are a primary source of ozone precursors as identified by the Minnesota Pollution Control Agency and Xcel Energy in various publications.

Item 23, Stationary Source Emissions, This topic should include a more complete discussion of the radioactive emissions and also the impacts of particulate from construction of cask storage facilities and other activities related to plant operation that are on-going (back up systems for heating, cooling, etc.)

Item 25, Nearby resources, First glance appears to be an incomplete list which does not include resources identified by the local community other than one "biologically sensitive area". This section also needs more discussion about impacts in the event of a release or accident.

Item 28, Infrastructure impacts. More information needs to be included including impacts of transporting nuclear fuel to the facility by truck or rail and explanation of why the plant needs electricity, it is a nuclear power plant after all.

Item 29, Cumulative Impacts, As this topic relates to the cask storage, the current treatment is inadequate.

Item 30, Social, Economic, and Community impacts (Other), There needs to be a discussion of the larger impacts of transporting nuclear fuel into the Monticello Community and metro area, the ongoing operations of the plant, and the long term impacts of storing highly reactive nuclear waste at a site for 200-10,000 years.

The long-term ability of humans to store, contain, and manage nuclear waste is something yet untested. While some may argue that we have done so effectively for the most of the last 50 years there are numerous case studies to argue the opposite point (e.g. Three Mile Island, Chernoble Disaster). Since the production of nuclear electricity is non-sustainable in its current form and since there are no methods to properly address long-term storage of deadly nuclear waste we think it is fairly myopic and somewhat reckless to move forward unless all risks are clearly delineated in the public's view. The environmental committee I represent does not endorse generation of power from non-sustainable sources and sources that have the potential to hurt or kill residents in the Minneapolis area in the event of an accident or failure.

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Subject: Comments on EIS scoping, PUC docket 04-87-CON-Monticello
Creation Date: Tue, Aug 2, 2005 6:57 PM
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