

From: PalisadesEIS
To: Doris Mendiola
Date: 8/30/05 9:24AM
Subject: Fwd: Public Comment, Palisades EIS

Comments regarding Palisades license renewal environmental scoping (70 FR 36967).

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6/27/05
70 FR 36967

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Attached please find my comments regarding the license renewal for the Palisades Nuclear Power Plant.

Mail Envelope Properties (430A2F8D.D29 : 5 : 19753)

Subject: Public Comment, Palisades EIS
Creation Date: 8/22/05 3:56PM
From: "Gary Karch" <gakarch@michiana.org>

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Files	Size	Date & Time
MESSAGE	102	08/22/05 03:56PM
TEXT.htm	418	
Public Comment, Palisades EIS.doc		29184
Mime.822	42519	

Options

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

Concealed Subject: No
Security: Standard

August 22, 2005

Chief, Rules and Directives Branch
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Washington, DC 20555-0001

Public Comments: Environmental Impact Statement re: Proposed 20 Year Extension of the Operating License for the Palisades Nuclear Power Plant [Docket No. 50-255; License No. DPR-20; Palisades owner is Consumers Energy/CMS; Palisades' operator is Nuclear Management Company, LLC]

Comments submitted by:

Gary Karch
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A process that appears designed to intentionally disenfranchise a population with which it is supposed to promote dialogue can only be looked at with skepticism and must be considered a ruse and a sham. Although the model as presented for public comment regarding the request for a twenty year license extension for the Palisades Nuclear Plant in Van Buren County, Michigan, meets guidelines as established by the NRC, it provides little opportunity and draconian deadlines for true citizen participation to exist. Such restrictions may have been dismissed by communities in which other license renewals have been requested and approved, but I submit that Southwest Michigan holds itself to higher standards and wishes to challenge the industry paradigm and demand a more reasonable and humane response to this license renewal process than the flawed one that has been foisted upon us.

Current standards only allow for easy participation from persons living within the industry-designated ten mile radius emergency planning zone. Obviously radiation travels far greater distances than that, and even the extended 50 mile radius does not realistically encompass the distance a radiation release can travel. Meetings have been scheduled only in the South Haven area with limited publicity and at times that impede a working public's ability to attend. These dates and locations may be convenient for Palisades representatives and NRC staff but not to residents in the greater area affected by the plant's existence. For example, the next public meeting in which these and other comments submitted by today's deadline will be discussed is scheduled for the Friday before Labor Day. This insults the public, inhibits participation by interested citizens and denigrates the integrity of the process.

Materials pertinent to the license currently available only at the South Haven library should be made available in a majority of libraries located within the 50 mile radius. The whole process needs to be expanded to include public meetings and comment opportunities in all communities within the entire 50 mile radius who wish to request them. If the plant owners and managers have nothing to hide and take pride in their operation, then they should have no

reservations about taking their meetings on the road and extending the process to a more reasoned pace. And if the NRC believes in the integrity of their process, they should likewise be up to this challenge. It is six years before the current license expires. There is no need to rush through the process. In fact, a more lengthy approach that is truly inclusive of citizen participation from affected communities should be encouraged.

Let us not forget that we are discussing the continued production for another 20 years of a lethal waste that requires extreme safety control measures. We are not talking about a tootsie roll factory here. The waste product is being stored on the shores of a body of water that constitutes one fifth of the earth's surface fresh water and which provides potable water to millions of people. Another twenty years of accumulated waste added to the already existing lineup of outdoor dry cask storage situated on unstable sand dunes is a major concern.

It has been recently confirmed by the National Academy of Science that there is no safe level of exposure to radiation and that even very low doses can cause cancer. I am therefore disturbed by nuclear industry corporate culture that has a ubiquitous record of dismissing legitimate concerns about radiation exposures. In the case of Three Mile Island, it has been found by more recent independent analysis of the 1979 accident that placement and frequency of monitoring devices were highly inadequate and unable to establish accurate data from which to establish radiation release patterns. For residents of Harrisburg and the surrounding area, that meant their reported symptoms of metallic taste, erythema, nausea, vomiting diarrhea, hair loss, deaths of pets and farm animals were attributed to stress brought on by the accident, not radiation releases from the accident. Apparently if no monitors were present in any given neighborhood and therefore no radiation data could be collected, then no radiation had been released. People were treated as though they had psychological problems, not legitimate symptoms of radiation exposure.

Exactly how will the citizens of Michigan be treated should a similar accident occur at Palisades? I simply refuse to accept my community being treated in such an insulting and degrading manner. I therefore ask that a complete map showing existing radiation detection locations for Palisades be provided and frank discussion on this monitoring methodology be initiated. I also ask that public health data regarding cancer rates in surrounding communities of the Palisades Nuclear Plant be included in the discussion, and participation by Michigan Department of Community Health epidemiologists be present at future hearings.

I also request that information reflecting the true financial taxpayer economic burden of the plant, including all anticipated guaranteed loans, tax incentives, and any other additional financial deals expected to be requested by plant owners that are contingent upon Palisades' continued operation, be provided at some point in the proceedings, or the means and process to obtain such data be provided. While I realize that this is not germane to the Environmental Impact Statement, disclosure of this information is vital to assessing Palisades' true financial worth to the community.