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NRC Staff:

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My comments are to be found in the attached file. Thanks.

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**Comments on the Draft Environmental Impact Statement (EIS) for the Grand Gulf Early Site
Permit Action**
(13 July 2005)

Why am I commenting on this draft EIS? Supposedly it is to offer my views and perspectives on the content of the document so the final EIS can be improved to fully address all the issues. In reality, I am commenting due to the continued failure of our Federal Government, and, in particular, the Bush Administration, to promote the general welfare of its citizens. While numerous forward looking nations, such as Japan, are moving forward with the promotion and commercial development of non-nuclear and non-centralized alternative energy sources such as solar electrical power, our federal government remains stuck in the rut of promoting and subsidizing nuclear energy as a means of generating electricity. Nuclear generated electricity that must, of necessity, be produced in large and costly centralized power plants that produce enormous amounts of highly radioactive wastes -- wastes that neither the government nor the private utility industry, has accepted responsibility for in the long-term. These wastes continue to be stored, above ground, at the plant sites where they were generated thus turning these sites into relatively insecure nuclear waste dumps. This is akin to disposing of household sanitary wastes in a concrete lined pit in the backyard of our homes—an act that is illegal in most places. Then, there is the problem of potential acts of terrorism at nuclear facilities. Neither the government nor the private utility industry has taken sufficient action to insure that a large scale terrorist attack against a nuclear plant can be thwarted, or that if such an attack occurred, it could be dealt with in a manner that would prevent release of nuclear material outside the boundaries of the plant. This omission constitutes a grave failure to provide for the common defense of our citizenry.

So what does the Grand Gulf EIS say about the environmental impacts of these and certain other related matters? Very little of substance, I am afraid. Much of the analysis in the DEIS is based upon the nebulous assumptions that constitute the Plant Parameter Envelope rather than on specific design information. Additionally, many potential environmental impacts are not analyzed at all or the needed analysis is being postponed into the future or passed off to other Federal agencies such as the Federal Energy Regulatory Agency. This situation is clearly contrary to Section 102. (C) (iv) of the National Environmental Policy Act that requires all agencies of the Federal Government to describe in their Environmental Impact Statements “The relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity”. Issuance of an Early Site Permit, based upon a set of nebulous assumptions and incomplete environmental analysis and for a situation where there is no clear long-term plan to deal effectively with radioactive waste disposal issues or issues involving potential terrorist acts and where there is no definitive plan on record or financial resources available to deal with a major disaster at the Grand Gulf site once new reactors are built is totally unreasonable and contrary to the public interest. The people of Mississippi and Louisiana and the Nation as a whole deserve more than this from their government.

As Abraham Lincoln reportedly said:

“You can fool some of the people all of the time, and all of the people some of the time, but you can not fool all of the people all of the time.”

The Bush Administration just does not understand this simple message. However, the Nuclear Regulatory Commission staff has a golden opportunity to help the current administration understand by recommending against issuance of an Early Site Permit for the Grand Gulf Site based upon the fact that the Draft EIS was prepared using inadequate information provided in large part by SERI. If and when the federal government and the utility industry act in a proactive and meaningful way to deal with the problems of long-term storage of nuclear wastes and potential terrorist incidents at nuclear plants and when a full analysis of all the potential impacts of new reactors at Grand Gulf is completed and the utility industry demonstrates it is willing to pay the full, unsubsidized cost for new reactors in accordance with free market principles, then issuance of an Early Site Permit should be reconsidered.

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