

South Haven, March 20 2006

RULES AND DIRECTIVES  
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USNRC

Chief, Rules Review and Directives Branch  
U.S. Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, DC20555-0001

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My Comments regarding document  
NUREG 1437, Supplement 27, Draft are:

(1)

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"Generic Environmental Impact Statement for License Renewal of Nuclear Plants (Supplement 27) ; Regarding Palisades Nuclear Plant ; Draft Report for Comments U.S. Nuclear Regulatory Commission February 2006.

**1 – Security measures and supervision requirements for the on-site storage of the spent fuel.**

It is clear that the amount of on-site, dry stored, spent fuel will increase during the renewal term as long as there is no final off-site storage facility provided by the Federal Government.

Therefore there would be additional security measures and supervision requirements to take care of the status of the on-site dry storage of spent fuel for an indeterminate period of time. Security measures would be: locate the dry storage facility at a place, guarded, hidden and less vulnerable to terrorist activity. I.e. The fact that the South Haven Municipal Airport is within 6 mile distance from Palisades, could imply the need to move the location of that Airport. Supervision requirements are related to continuous monitoring and accounting of the spent fuel during offsite storage. This activity could be an important part of the Palisades renewal term. All these impacts should be considered for the OL extension alternative.

**2 – Compliance with Homeland Security regulations.**

The SEIS (Supplemental Environmental Impact Statement) report should acknowledge that there has been changes in our government strategy since the original issuance of Palisades OL, particularly regarding sabotage and/or terrorism. Therefore additional analysis are required for OL Renewal.

We believe that additional Severe Accident Mitigation Alternatives (SAMAs) regarding this issue should be considered for Palisades Operation License Renewal.

**3 – Environmental impact of the on site dry storage of the spent fuel**

The spent fuel during the renewal term, while in on-site dry storage, would have discharges of radioactive elements and neutrons that by collision with the surrounding natural molecules could generate additional radioactive elements. These discharges should be added to the atmospheric emissions and ground discharges of the Plant to verify overall compliance with the EPA and NRC regulations.

SISB Review Complete

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#### **4 – Environmental Impact of severe emergencies in Nuclear Plants.**

Environmental Impacts during severe emergencies at the Nuclear Plant (uncontrolled releases of radioactive elements) were not considered for comparison purposes with other non nuclear alternative sources of energy. Even though probabilistic, these impacts should be evaluated and mentioned in the report's final summary conclusions.

#### **5 – Loss of Power in the National Electric Grid**

Recognizing that the loss of power at the Palisades Substation could result in severe Plant accidents (core damage), we wonder if all feasible mitigation measures were considered in this regard. I.e. adding a second circuit to the 345kV line connecting Covert Plant to the Substation.

#### **6 – Plant Refurbishing Work**

The fact that in the Application for renewal the Licensee states that no refurbishing will be performed prior to extended term operation is of our outmost concern. We believe that after 40 years of operations, a thorough refurbishing should be mandatory to insure a safe Plant operation during the extended term.

#### **7 - General comments regarding alternative sources of electric energy.**

a – The considered Environmental Impacts were not weighted as required to perform an overall impact evaluation. In other words, not all environmental impacts have the same effect.

b – Renewable (sustainable) energy sources should be given extra points when compared with energy sources of lower availability

Wind and Solar sources are renewable energy sources.

The Standard Nuclear Plant, using Light Water Cooled Reactor, is a source of limited availability. New types of Nuclear Reactors, using advanced fuel cycle or a fast neutron reactor would be of longer availability.

c - Nuclear Power alternatives using advanced fuel cycles would decrease the amount of long term hazards of nuclear waste. Is this point being considered in the comparison of Nuclear Plants ?

d – Is the impact on Proliferation of radioactive materials in the World being considered to evaluate the Nuclear Plants ?

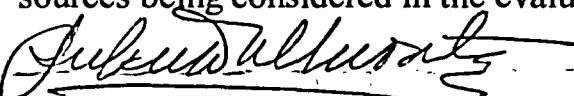
The standard Nuclear Plant using 5% enriched Uranium has technology and materials, that could be used for the manufacture of the plutonium bomb.



e - Between the alternatives to be considered to obtain an "equivalent" electric generation we believe that the following should be maintained as technically feasible:

- Hydro-Pump storage (not considered in GEIS)
- Demand side Load Management. (considered but disregarded)  
I.e. the introduction of smart electric meters.
- Wind Power (considered in GEIS Page 8-45, but disregarded)
- Solar Power (considered in GEIS Page 8-45, but disregarded)
- Co-generation (not considered in GEIS)

f – Are the CO<sub>2</sub> atmospheric emissions for the different energy sources being considered in the evaluation of alternatives ?



Ruben Dal Monte P.E.  
630 62<sup>nd</sup> Street  
South Haven MI, 49090  
Phone (269) 236 6237  
e-mail: rubendalmonte @ cs . com