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OFFICE OF SECRETARY   
RULEMAKINGS AND   
ADJUDICATIONS STAFF

Docket No. 52-008-ESP

RAS No. 8206

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July 18, 2004

Dear Judge Bollwerk,

The Virginia Chapter of the Sierra Club has examined the early site permit application of Dominion Power for new nuclear reactors at North Anna and has approved this position paper. Please consider this input as you make your decision on this important issue.

Sincerely,

John A. Cricksblank

## Position on New Nuclear Reactors at North Anna

The Sierra Club Virginia Chapter opposes approval of additional nuclear reactors at the North Anna site, or certification of that site as suitable for new units, for the following reasons:

- 1) When it is shown that additional electric generation capacity is needed, the Sierra Club Virginia Chapter believes that new electric generating units preferentially should be sited at existing power plant sites or industrialized areas in order to minimize impacts on unspoiled areas, provided such existing sites can satisfactorily sustain the additional impacts on land, air and water resources. However, the North Anna site has serious problems as a site for additional reactors, particularly with regard to adequacy of water resources to support additional thermal power plant cooling operations. Based on the proponent's own data and analysis, additional loss of lake water associated with either once-through lake cooling or withdrawals for evaporative cooling towers would seriously compromise the ability to maintain lake levels within current operating targets and will likely result in significant decreases in releases of water to downstream aquatic habitats, especially in periods of low flow and drought conditions. Existing units already result in releases that fall below the minimum 40 cps specified in the NPDES permit. Larger excursions in lake levels will adversely affect fish propagation and aesthetic and recreational uses of Lake Anna. Further decreases in downstream releases would adversely affect the hydrology and ecology of streams in the York River Watershed, including the North Anna River and the Pamunkey River. No power additions or certification of site suitability should be approved that could result in further reductions in the minimum actual releases from Lake Anna.
- 2) Virginia currently has an excess electric generation capacity for its in-state needs but continues to approve new fossil-fueled generating units that primarily will serve out-of-state customers while increasing air pollution, water resource consumption and transmission line impacts in Virginia. Neither the State of Virginia nor any of its major power generating companies has undertaken substantial initiatives to encourage or provide safe, clean renewable energy resources or to adequately promote energy conservation. The Sierra Club Virginia Chapter believes that the time has come for the state government, major utilities, and power production companies to establish aggressive policies, actions, and quantitative targets for energy conservation and clean renewable energy production to the maximum extent feasible before approval of further projects for polluting fossil-fueled or unsafe nuclear power production in Virginia.
- 3) As a matter of national policy, the Sierra Club opposes licensing, construction and operation of nuclear reactors utilizing the fission process pending:<sup>1</sup>
  - a) Development of adequate national and global policies to curb energy over-use and unnecessary economic growth.
  - b) Resolution of the significant safety problems inherent in reactor operation, disposal of spent fuels, and possible diversion of nuclear materials capable of use in weapons manufacture.

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<sup>1</sup> Based on resolutions adopted by the Board of Directors, December 12-13, 1974 and May 5-6, 1979.

- c) Establishment of adequate regulatory machinery to guarantee adherence to the foregoing conditions. The above resolution does not apply to research reactors.

The problems of waste disposal, materials security and reactor safety remain unresolved. No permanent repository for reactor waste has yet been licensed and the Yucca Mountain repository has serious deficiencies for long-term safe containment, so there is no satisfactory solution in sight for waste disposal within the foreseeable future. Meanwhile, wastes from existing reactors continue to accumulate on-site in temporary storage at North Anna and other US reactors.