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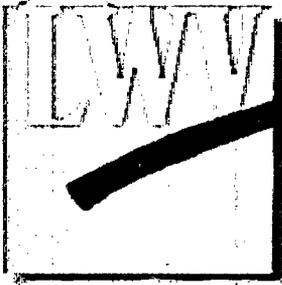
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**LEAGUE OF WOMEN VOTERS  
OF OCEAN COUNTY, NJ**

September 4, 2006

The League of Women Voters submits the following comments on the (NRC) Nuclear Regulatory Commission's Draft Generic Environmental Impact Study (GEIS) for the Re-Licensing of Oyster Creek Nuclear Generating Station:

**1. The use of 1970 data to analyze the cumulative effect of Oyster Creek operations on Barnegat Bay:**

At the July 12, 2006 public hearing Professor Michael Kennish, a research professor at Rutgers University and an acknowledged authority on the ecology of Barnegat Bay, pointed out that no recent data on the cumulative effect by Oyster Creek on Barnegat Bay had been provided to the NRC. He also emphasized that the studies used by the NRC to evaluate the current situation were at least 30 years old, and though they were relevant at that time, they no longer gave a reasonable basis on which to assess the current status of Barnegat Bay. The League is deeply concerned not only about the lack of relevant viable data, but about the NRC's lack of insistence on obtaining this critical information.

It was also pointed out at this same hearing that the maps used in the draft report to identify the Oyster Creek and Forked River had inaccuracies relating to the designations of the Oyster Creek and the South Branch of Forked River waterways.

Please provide the League with the NRC's reasons behind the decisions to use the obsolete 1970 data and the use of inaccurate maps. We would like your thoughts on how results based on incorrect information can be anything but incorrect.

**2. The failure to analyze the effects of a nuclear accident or terrorist attack at Oyster Creek:**

Failure to perform an in-depth study on the environmental impact of a severe accident when considering the risk in operating an aged nuclear plant with documented problems of corrosion of its drywell, the containment barrier necessary for protection of the public from the effects of radiological releases, for another 20 or more years is unacceptable.

The presumption that a terrorist attack and subsequent fuel pool fire would not affect the environment in a critical way is in contradiction to the warnings from scientists, many government agencies and the National Academy of Sciences.

**3. The NRC's reliance on AmerGen for data that constitutes the substance of its draft report:**



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It has been documented by citizens and verified by NRC Engineers, that AmerGen has used flawed data for 10 years in estimating the status of a critical safety component, namely, the drywell liner. Further, its owner Exelon had not provided information to the NRC about its ten-year leak of tritium at its plant in Illinois.

**4. Protection of drinking water in Ocean County, NJ:**

The health and safety of the ecologically delicate Cohansey and Kirkland aquifers for present and future generations demand that a more viable and in-depth study of the extent of the "intrusion" of radionuclides into these aquifers be undertaken and documented as a part of this report and for the public record.

**5. Cooling Towers:**

The League supports the recommendation by the NJ Department of Environmental Protection that natural draft cooling towers should be installed at Oyster Creek. The NRC's acceptance of AmerGen's system using mechanical draft cooling towers, which consume more energy, is an incorrect response to an important problem.

In conclusion, the League of Women Voters looks forward to receiving the responses from the Nuclear Regulatory Commission to each of the above comments and calls for the NRC to conduct a public hearing before the final report is issued.

Respectfully submitted,

Joan K. Rubin

*Gail Marsh Saxer*

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