

Comments for the Public Hearing on the Final Environmental Impact Statement for an Early Site Permit (ESP) at the Exelon Site near Clinton, Illinois
2006 November 08
Roy C. Treadway

For many reasons, I urge that this Final Report on the *Environmental Impact Statement for an Early Site Permit (ESP) at the Exelon ESP Site* (U.S. Nuclear Regulatory Commission, 2006) near Clinton, Illinois, be rejected. While many are the reasons for rejecting this report, I will give four important reasons in my comments.

First, the quality of the data in the report may be of questionable accuracy. At least, in the section on Demographics in the report (pp. 2-42 to 2-43), the report uses data provided by Exelon in 2006 giving "resident" population by distance zones of the Exelon Site from 2000 to 2060 (Table 2-6), employing population projections from 1990 census data produced by Illinois State University. According to Exelon (2006), data from 1990 were used because population projections from the 2000 census were not "available" in 2006. While a demographer at Illinois State University, I directed the development of these projections from 1990 population data. Thus, I know well they are terribly out of date and are no longer accurate. The Illinois Department of Commerce and Economic Opportunity (DCEO), however, completed new population projections from the 2000 census in June 2005; I have a copy of them. Why were not they used in the Environmental Impact Statement, released over one year after the new projections were completed? One wonders if the accuracy of the data in the rest of the report were gathered in as sloppy a manner.

Second, the Environmental Impact Statement glosses over the fact that no suitable, permanently safe site is available for storage of radioactive wastes from current nuclear power plants in the United States, not to mention the proposed second nuclear power plant at Clinton. On page 6-14, the report says "Consequently, at this time, for the high-level waste and spent fuel disposal component of the fuel cycle, there is some uncertainty with respect to regulatory limits for offsite releases of radionuclides for the current repository site", that is, Yucca Mountain. While the rest of the page is equally obscure, the report does recognize there is no approved place to permanently put radioactive wastes. Equally, nowhere in the report is it mentioned that no place can possibly exist to store radioactive material for the hundreds of thousands of years that they will remain lethal to all humans and all life. Since there is no way of disposing of high-level waste and spent fuel safely, this proposed nuclear power plant at Clinton is fundamentally unsafe. For this reason the Environmental Impact Statement should be rejected.

Third, the Environmental Impact Statement, on p. 8-3, dismisses without serious consideration the role that energy conservation can play in reducing the need for a second nuclear power plant at Clinton. Indeed, the reason given is "..., Exelon anticipates that it will not be able to offer competitively priced power if it has to retain an extensive program involving conservation and load-modification incentives (Exelon 2006)." This report, however, is not about whether Exelon can make a profit but whether a second nuclear power plant at Clinton is environmentally safe. Many other institutions believe conservation is quite practical and effective in reducing demand for electricity. The Town of Normal requires Leadership in Environment and Energy (LEED) standards for new buildings in its downtown and other redevelopment areas; it believes that energy conservation and efficiency are practical and affordable. Why does not Exelon? After all, if no second nuclear power plant is built at Clinton, that will be much more environmentally sound than if one is built.

Fourth, the Environmental Impact Statement, on p. 8-17 to p. 8-21, ignores the very real potential of renewable, alternative sources of energy, particularly wind and solar, to generate suitable, secure

electricity in Illinois. In the last three or four years, while the environmental impact statement for the second nuclear power plant at Clinton has been under consideration, approximately 1,650 MW of electricity generation – over one and a half times as much electricity generated by the current nuclear power plant at Clinton – has been built, is under construction, or is planned in Illinois, according to the American Wind Energy Association (2006). The Center for America Progress (2006, 26) reports that “According to governmental studies, the wind resources of Kansas, North Dakota, and Texas alone are in principle sufficient to provide all the electricity the nation currently uses.” Illinois and other states, including off-shore sites, could provide even more electricity. Solar thermal and photovoltaic sources of electricity are increasing rapidly, while costs are dramatically dropping and efficiency significantly increasing (Center for America Progress, 2006, 28-30). With alternative, renewable sources of electricity, baseload can be managed with a shared network over a wide geographical area, hydro and geothermal storage of energy, fuel cells, improved batteries, and use of biofuels when necessary (Center for America Progress, 2006, 16). Most of these wind and solar units are small, and if one is not producing electricity, the others are; if a nuclear power plant is taken off producing electricity because of an operating problem, a large baseload source is removed from the grid. In today’s world, denying the potential of alternative, renewable energy is much like denying global warming. Alternative, renewable sources of electricity are viable, feasible, inexpensive, and environmentally safe, unlike nuclear power. The Environmental Impact Statement denies this and, thus, should be rejected.

In the United States as well as in Illinois, we expect our regulatory agencies to regulate the industries with which they deal, not just support those industries to do whatever they want to do. We expect the Food and Drug Administration to keep unsafe drugs off the market, not approve what the pharmaceutical industry wants. We expect the Forest Service to protect our national forests, not help the lumber companies to cut all the timber they wish. Thus, we were very pleased – and somewhat surprised – when last week the Illinois Pollution Control Board unanimously approved strong new rules to reduce mercury pollution by coal plants by requiring the installation of modern pollution control equipment (Environmental Law and Policy Center, 2006). Regulation to enhance and make safer the environment by a regulatory agency *is* possible. We expect the Nuclear Regulatory Commission to be sure that nuclear power is environmentally safe. Since that is **not** possible, we expect the Nuclear Regulatory Commission to deny approval of the Environmental Impact Statement. Thus, for this reason and the many other reasons I have mentioned in my comments, this Final Report on the *Environmental Impact Statement for an Early Site Permit (ESP) at the Exelon ESP Site* near Clinton, Illinois, should be rejected.

References

- American Wind Energy Association. 2006. *Wind Project Data Base*. Washington, DC.
- Center for American Progress. 2006. *American Energy: The Renewable Path to Energy Security*. Washington, DC.
- Environmental Law and Policy Center. 2006. Press Release (November 2).
- Exelon Generation Company, LLC (Exelon). 2006. *Exelon Generation Company, LLC, Early Site Permit Application: Environmental Report, Rev. 4*. Kennett Square, Pennsylvania: Exelon Nuclear.
- U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation. 2006. *Environmental Impact Statement for an Early Site Permit (ESP) at the Exelon ESP Site, Final Report*. Washington, DC: U.S. Government Printing Office.

Roy C. Treadway, 712 N. School St., Normal, Illinois

DOCKETED
USNRC

November 21, 2006 (2:00pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Docket No. 52-007-ESP
