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**Doris Mendiola - Comments on Early Site Permit, Plant Vogle nuclear reactors**

**From:** "Center for a Sustainable Coast" <susdev@gate.net>  
**To:** <Vogtle\_EIS@nrc.gov>  
**Date:** 12/05/2006 1:33 PM  
**Subject:** Comments on Early Site Permit, Plant Vogle nuclear reactors

10/5/06  
71 FR 58862

Please accept the attached statement on behalf of the Center for a Sustainable Coats and enter it into the record for the referenced proposed facilities at Plant Vogtle.

A signed copy will be mailed to the NRC in Washington. Please advise if you would like any other hard copies to be distributed.

Thank you.

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**Creation Date** 12/05/2006 11:39:38 AM  
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Final draft - comments on Vogle ESP application .doc		92160
Mime.822	130116	

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December 4, 2006

**RE: Environmental Scoping Comments from Center for a Sustainable Coast on the Southern Nuclear Operating Company Early Site Permit Application for nuclear Plant Vogtle**

The Center for a Sustainable Coast is a membership supported non-profit organization that represents the public interest in issues related to coastal Georgia's growth, economy, and environment. Our mission is to advance the conservation, preservation, and sustainable use of the region's resources – natural, historic, and economic. Due to the systemic nature of the issues encompassed in our broad mission, we take positions on a wide array of public policies and government-regulated activities, including land use, economic development, water withdrawal, wastewater discharge, air emissions, and energy production.

We share the concerns of the Southern Alliance for Clean Energy (SACE) related to the proposed expansion of nuclear plant Vogtle as outlined in the early site permit (ESP) application submitted by Southern Nuclear Operating Company (SNC). We strongly urge the NRC to consider its obligation to the public by expansively analyzing the true costs, benefits, and impacts of the proposed new reactors in terms of long-term, large-scale public interest, not artificially narrow criteria that are better suited to private sector business decisions. NRC is well-advised to take such opinions seriously in light of a recent report by the Government Accountability Office that reveals fundamental flaws in project analysis by another federal government agency that evaluates massive projects, the Corps of Engineers. (See GAO-06-529T, March 2006.) We strongly suspect that NRC, like the Corps and other politically vulnerable governmental institutions, is at risk of drifting dangerously far from its mission due to various forces that cause a pre-determined outcome to be falsely substantiated by incomplete and subjective analysis.

The licensing of two nuclear power reactors, with enormous commitments of water needed for cooling, being proposed at the same time Georgia policies are advocating prudent improvements in water-using efficiencies, is in direct conflict with public interest as strongly supported initiatives in state water management. Nuclear is the most water-intensive of all power sources per kilowatt hour, is extravagantly subsidized by federal funding, and poses virtually permanent threats to public health and safety – due to handling and storage of radioactive materials as well as potentially catastrophic impacts linked to human error, operation or equipment failure, or acts of terrorism.



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Such energy sources are simply not suited to sustainable and wise use of our natural resources in meeting human needs. What is true generally is even more applicable along the Savannah River, which is already burdened by conflicting demands in both Georgia and South Carolina, areas having severe water quality problems, and pre-existing proposals that further threaten the ecosystem functions, including those of the estuary, one of the most essential fish habitats on the planet. Squandering water resources on cooling for nuclear-based power production is irresponsible, especially in light of the potential for increasing energy efficiency and the use of alternative technologies such as solar, wind, and tide power.

We are especially troubled by the inevitably adverse effects that any expansion of conventional types of power-generating capacity will have on renewable, safe energy technologies that capture the enormous potential of wind, solar, and tide power sources. Wind technology with generating capacity comparable to the proposed reactors, for example, could be implemented well within the period required to permit and construct the new facilities at Plant Vogtle. Wind mapping off of Georgia's coast clearly indicates that harvesting wind energy would be practical, and the proven experience in other nations strongly suggests that this could be accomplished within a 5-year period — with little chance of cost-overruns that have been all too typical of nuclear facilities, which also often take as long as eight-to-ten years to be made operational. By permitting the construction and operation of the proposed new reactors, future demand for power that could be met by using alternative sources will be unwisely eliminated. Moreover, federal funds that might be used to provide justifiable incentives for investing in renewable energy technologies would instead be devoted to perpetuating the substantial subsidy of nuclear energy, which has used about 60% of all U.S. federal energy spending for the past 50 years.

For all of these reasons, the Center for a Sustainable Coast is unconditionally opposed to the approval of nuclear reactors at Plant Vogtle or anywhere else in Georgia's coastal watersheds. We resolutely join SACE in recommending that the Nuclear Regulatory Commission (NRC) prepare a comprehensive and objective Environmental Impact Statement (EIS) for the new facilities proposed at Vogtle that includes an appropriately broad range of effects that building and operating two more nuclear reactors at that location will impose on Georgia's communities, economy, and environment — defined as broadly as needed to serve the long-term public interest. As stated by SACE staff in their submitted statement, such an analysis must include careful evaluation of the potential for improving the efficiency of energy use by all sectors and the implications of such advancements for Georgia's future.

We appreciate the opportunity to comment and welcome your response.

Sincerely,

David C. Kyler  
Executive Director