

From: "Connie & Bob Fletcher" <fletcher-b@mindspring.com>
To: <Vogtle_EIS@nrc.gov>
Date: Mon, Dec 4, 2006 11:03 PM
Subject: Comments on Vogtle ESP

Dear Sir:

Attached is our letter containing comments about subject proposal. It is in Microsoft Word format.

Sincerely yours,

Mr. & Mrs. Robert E. Fletcher
244 Lamplighter Lane
Marietta GA 30067-4972
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TEXT.htm	1044	
New Reactors at Vogtle.doc	39424	
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**244 Lamplighter Lane
Marietta GA 30067-4972**

December 4, 2006

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mailstop T-6D59
U. S. Nuclear Regulatory Commission
Washington DC 20555-0001

Dear Sir:

We are long-time residents of Georgia and we strenuously object to issuance of an Early Site Permit (ESP) for an additional two nuclear reactors at the existing Vogtle nuclear power plant in Burke County, GA. Our concerns center around safety, public health, nuclear waste disposal, and the environment.

Safety.

Accidents and near-accidents have occurred at nuclear plants in the past. The best known incident in the U. S. is the partial core meltdown at Three Mile Island in Pennsylvania. As Peter Bradford, former commissioner of the NRC said: "The abiding lesson that Three Mile Island taught Wall Street was that a group of N. R. C.-licensed reactor operators, as good as any others, could turn a \$2 billion asset into a \$1 billion cleanup job in about 90 minutes."

More significantly, the 1981 government report "Calculation of Reactor Accident Consequences for U. S. Nuclear Power Plants (CRAC-2)" indicates that a worst case accident at any U. S. nuclear plant could result in tens of thousands of deaths from near-term radiation effects and long-term fatal cancers, and cause hundreds of billions of dollars in damage. Specifically, a 1982 Congressional report estimated that a meltdown at just one of Vogtle's reactors could cause 39,000 peak early injuries, 4,000 peak cancer deaths, and 200 peak early fatalities with costs over \$60 billion. Of course, the human population in the vulnerable area around Plant Vogtle has grown in the 24 years since the report was compiled, thereby increasing human exposure proportionately.

What about accidental "near misses" at nuclear plants? A couple of examples will suffice. The Davis-Besse plant, a pressure water reactor (PWR) near Toledo, Ohio, was brought on line in 1977. In 2002 during a prescribed inspection, the operator found that boric acid leaking inside the core had corroded a large hole (4 X 5 inches) completely through the steel top of the reactor vessel. Amazingly, the only material left to contain the superheated cooling water at 2,180 psi was a stainless steel liner 1/8 inch thick. Although this potentially serious situation was finally detected in 2002, the problem with boric acid corrosion in reactors had been known by NRC for decades. Moreover, three years before this "near miss", a violation had been issued by NRC to Davis-Besse for its inadequate boric acid corrosion control program.

Serious system shortcomings at nuclear plants can continue uncorrected for a long time. For example, in 1998, the operators of the Big Rock Point nuclear plant informed NRC that the vital Standby Liquid Control System had been completely inoperative for somewhere between 13 and 18 years.

The terrorist threat to nuclear plants has recently come to the fore and represents a new and substantial concern over safety. Beyond a doubt, the actual "risk index" for nuclear power plants in the U. S. has gone up considerably as a result.

Public Health.

The previous section describes some of the public health risks associated with operation of nuclear power reactors. However, proper consideration should be given to risks surrounding the entire nuclear fuel cycle. Storage, transportation, and reprocessing of spent fuel introduces additional risks to human health and the environment that approach those of reactor accidents.

Spent Fuel Disposal.

We think that permanent disposal of spent nuclear fuel must be solved and implemented in a totally effective, scientifically-sound, and safe manner before any new programs to increase nuclear power generating capacity are undertaken in the United States.

The hope has been that the Yucca Mountain site in Nevada will provide permanent geological storage for spent nuclear fuel (protective for tens of thousands of years). However, we understand that there are significant scientific problems associated with the Yucca Mountain site and that no license application has actually been filed. This is in spite of 20 years of study and expenditure of taxpayer money to the tune of \$9 billion. If the problems with Yucca Mountain were magically solved, spent nuclear fuel already temporarily stored on site at nuclear plants around the country would almost equal the regulatory limit of the Yucca Mountain repository (70,000 metric tons).

As far as we know, there are no operating permanent geologic repositories for spent nuclear waste anywhere in the world. This is in spite of the fact that the first commercial reactor was brought online (and started generating spent fuel) 50 years ago.

Considering the lack of progress in providing a safe geological repository for spent nuclear fuel in the United States, it is reasonable to assume that spent fuel generated by Vogtle will continue to be stored onsite for generations. Spent fuel from the proposed additional reactors will magnify the scope of this problem. This "temporary storage" will continue to threaten the health of people in the nearby communities and the environment.

If a safe permanent repository is eventually provided, safety problems will then arise relative to the transportation of the spent nuclear material from all over the country to the repository site. This, in turn, will place people in the general vicinity of the selected transportation routes at considerable risk. (Note: Our prior experience includes employment in the U. S. Department of Transportation with relevant work on the preliminary system design for the Chemical Hazard Response Information System – CHRIS.)

Environmental Consequences.

The two existing reactors at Vogtle require huge amounts of cooling water with only about 1/3 being returned to the Savannah River. 63 million gallons per day are withdrawn and, of this, consumptive use is 43 million gallons which is then eliminated from possible downstream use. To put this in perspective, 43 million gallons per day is enough to supply about 150,000 households. Obviously, two additional reactors will roughly double the consumptive use requirement to about 80 million gallons per day.

Plants, fish, and other aquatic life can live and reproduce in water with temperatures within certain safe ranges, depending on species. Adding two more reactors at Vogtle will increase the heat output to the Savannah River thereby placing additional aquatic species at risk.

Conclusions.

Nuclear power has substantial disadvantages with respect to safety, spent fuel disposal, cost, security, proliferation of bomb-making materials, and environmental impacts.

There are alternatives to nuclear power generation that are less expensive and which are significantly less risky. In evaluating cost per kilowatt-hour it must be remembered that nuclear power is heavily subsidized in a number of ways. This subsidization must be factored in when making cost comparisons with alternative generating systems.

Greater energy efficiency and conservation will reduce the demand for power generation and lessen the need for additional power plants. There is considerable potential for these beneficial measures in the United States because our per capita consumption of energy is about twice that of other industrial nations having comparable qualities of life.

Studies have shown that nuclear electric power is considerably more expensive than that currently produced in fossil fuel plants. There is a real need to reduce our reliance on fossil fuels. However, more efficient natural gas and integrated gasification combined cycle (IGCC) coal plants can help in the transition from fossil fuels.

Renewable energy sources such as windpower, solar power, and biomass have become or are becoming cost competitive with electric power generation using fossil fuels, and should play an increasing role in electric power generation.

For the reasons stated herein, we urge the NRC to deny the Early Site Permit application for two additional nuclear reactors at Plant Vogtle.

Sincerely yours,

Robert E. Fletcher

Constance A. Fletcher