

BAS 13028

From: "Bove, Frank J. (ATSDR/DHS/SRB)" <fjb0@CDC.GOV>
To: <hearingdocket@nrc.gov>
Date: Thu, Feb 8, 2007 3:09 PM
Subject: Limited Appearance Statement to NRC Concerning the Early Site Permit for Plant Vogtle expansion

Attached is my limited appearance statement concerning the early site permit for Southern Nuclear Operating Company's Vogtle ESP site.

<<limited appearance statement on Vogtle ESP.doc>>

Thank you.

Frank J. Bove, Sc.D
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DOCKETED
USNRC

February 8, 2007 (3:09pm)

OFFICE OF SECRETARY
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From: "Bove, Frank J. (ATSDR/DHS/SRB)" <fjb0@CDC.GOV>

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RE: LIMITED APPEARANCE STATEMENT TO NRC CONCERNING THE EARLY
SITE PERMIT FOR SOUTHERN NUCLEAR OPERATING COMPANY'S VOGTLE
ESP SITE

February 8, 2007

Dear Judge Bollwerk:

My name is Frank Bove, and I am a board member of Environmental Community Action ("ECO-Action"), a grassroots environmental organization in Georgia. As a citizen of Georgia, I am concerned about the proposed expansion of Plant Vogtle as well as the state's current excessive dependence on nuclear power plants and coal fired plants to supply our electricity needs.

I wish to express my opposition to Southern Nuclear Operating Company's application for an early site permit for the Plant Vogtle expansion. **Nuclear power is a dangerous, expensive, and unnecessary technology. There are safer, cleaner and lower cost alternatives to the Plant Vogtle expansion such as energy efficiency measures and renewable energy sources such as solar power and wind.** I am requesting that the NRC broaden the scope of its Environmental Review Process and explore a wide range of renewable and energy efficiency alternatives to the proposed Plant Vogtle expansion. In particular, the NRC should consider what Southern Nuclear and its parent company and associated companies could be doing to promote energy efficiency and renewable energy sources.

There is no debate that energy efficiency measures are the cheapest, quickest, and safest way to meet electricity demand. Up to half of the electricity we use in this country is not used efficiently. Many states have realized this and are taking action. Unfortunately the state of Georgia has an extremely poor record when it comes to energy efficiency. According to an October 2005 report of the American Council for an Energy Efficient Economy, GA ranks 37th in energy efficiency spending per capita and energy efficiency spending as a percentage of total utility revenues. While the top 10 states spend over \$10 per capita on energy efficiency, and the national average is \$4.65, GA spends 15 cents

per capita. Whereas the top 10 states spend 1.2% to 3% of total utility revenues on energy efficiency, and the national average is 0.52%, GA spends a meager 0.02%.

A 2005 report by the Georgia Environmental Facilities Authority entitled “Assessment of Energy Efficiency Potential in Georgia” stated the following:

- “In recent decades, many energy utilities and public agencies have made strong and sustained efforts to promote energy efficiency through programs and standards. These efforts have brought significant economic benefits to energy customers and have contributed to ongoing initiatives to enhance the environment and improve public health nationwide.
- However, the state of Georgia has not invested in energy efficiency as vigorously as most other states. In fact, Georgia is one of a small number of states in which energy efficiency programs are barely in evidence.
- For this reason, there is now great opportunity to seize energy efficiency as a large untapped source of economic and environmental benefits for the state of Georgia. Building upon the successes and failures of a wide range of other energy efficiency efforts, Georgia is in an excellent position to stimulate greater investment in energy efficiency. “

The report went on to add that energy efficiency measures could save the state up to \$1.5 billion and reduce state water usage by up to 234 million gallons per day. This could be achieved by adopting measures that would reduce electricity sales by 8.7% and peak demand by 6.1%. These are very modest goals. Other states have embarked on much more ambitious energy efficiency programs.

Twenty-three states have established renewable portfolio standards that require their utilities to derive a certain percentage of their generating capacity from renewable sources, but Georgia has not done so. The State Energy Strategy for Georgia emphasizes that state electric utilities have been deficient in offering demand management services found elsewhere in the nation. Because of a lack of these services, GA residents consume 25% more electricity than the national average, and GA industries consume 106% more electricity than the national average. This inefficient use of electricity results in higher monthly electric bills for residents and industries in GA.

Simply by promoting reasonable measures to improve the efficiency of electricity usage in the state, GA utilities can meet the needs of a growing population over the next several decades without building new nuclear or coal plants. In addition to energy efficiency measures, GA utilities should be transitioning to safe, clean and affordable renewable energy sources such as wind power, solar power, and hydrogen fuel cells. For example, wind power today produces electricity at half the cost of nuclear power. Currently, centralized solar thermal plants produce electricity at a cost competitive with nuclear power. In the next decade, photovoltaic cells and hydrogen fuel cells will be competitive sources of electricity generation.

To conclude, nuclear power is a dangerous technology, an expensive technology, and an unnecessary technology. A thorough alternatives assessment would show without a doubt that there are safer, cleaner, and cheaper alternatives to Plant Vogtle expansion. We ask the NRC to undertake a thorough alternatives assessment, and reject Southern Nuclear's application.

Sincerely,

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