

From: Ann Karp <annelizabethkarp@hotmail.com>
To: <VOGTLE_EIS@nrc.gov>
Date: 12/29/2007 9:15:15 AM
Subject: Comments on the Vogtle EIS

To Whom It May Concern:

I've learned that today is the last day for comments on the Vogtle EIS. As a resident of Georgia and an active citizen involved in NukeWatch South, I have strong opinions about this issue. They are summarized below. Thank you for your attention. I look forward to your reply addressing these grave concerns:

€ **TERRORISM AND INSIDER SABOTAGE** are not considered in the Vogtle EIS.

This

uniquely dangerous location has the whole of Augusta, Aiken, Savannah River Site and Barnwell within the 50-mile Vogtle radiation emergency zone. Even without adding two new reactors the area has a uniquely high concentration of dangerous nuclear facilities. The NRC is under increasing pressure to take up the terrorism issue, having been ordered to by the Ninth Circuit in California. Point of fact, DOE decided in December 2006 to consider terrorism and insider sabotage at all new DOE facilities, both nuclear and non-nuclear so it's high time NRC gets on board.

€ **WATER (local impacts)** Neither the water vapor (classified as air pollution under Clean Water Act) nor the heat vented into the local environment have been considered in the EIS. Of the enormous heat generated by Vogtle (and all) reactors, only 1/3 is used for energy, the other 2/3 is vented into the local environment as steam and heated water. This local impact must be considered.

€ **WATER (downstream impacts)** While the EIS acknowledges saltwater intrusion into the groundwater serving downstream communities such as Bluffton and Hilton Head, South Carolina, due to heavy upstream use of the Savannah River, it states that the communities will just have to switch to river water! This is unacceptable. To sign off on letting Vogtle 3 & 4 exacerbate saltwater intrusion at the mouth of the Savannah River is an unacceptable position.

€ **NUCLEAR WASTE** The EIS fails to analyze the likelihood that nuclear waste will remain on the site indefinitely due to the failure of the national repository program (Yucca Mountain). In analyzing long-term storage of high-level spent nuclear fuel, it should utilize the concepts put forth for hardened robust dry cask above-ground storage as put forth in the position paper ³Principles for Safeguarding Nuclear Waste at Reactors.² (NOTE: This

paper was submitted into the record by Nuclear Watch South)

€ ALTERNATIVES The EIS is required to consider alternatives to the proposed project. The EIS analyzes only conventional, large, centralized power sources, such as coal, oil, hydro. In its analysis of renewables it dismisses wind and solar power as not suitable to 1,000 megawatt power plant use. The fair alternative to consider is decentralized renewables leased to individual electricity users: businesses, residents and industries. The power company would establish a profitable program which integrates power production directly with the area being served. Hooked to the grid, the customer who uses less electricity than it generates sells the excess power directly to the power company for other customers to use ... a powerful incentive to conserve which would impact the equation on production/consumption.

€ TAXES The EIS fails to analyze the national impact of underwriting the multi-billion dollar Vogtle proposal with federal public tax money. The EIS must compare the estimated amount of tax money for Vogtle with social programs that would have to go unfunded such as education, health care, poverty and housing.

€ WORKER SAFFETY The EIS fails to analyze impacts to construction workers on Vogtle 3 & 4 should a radiological accident occur at Vogtle 1 & 2.

€ FATAL FLAW IN VOGTLE EIS PROCESS This EIS attempts to cover all conceivable environmental impacts from Vogtle 3 & 4 in a brand-new NRC process to give an ³early site permit² that would be good for 20 years. This means that if Southern Co. begins construction on Vogtle in 2027, the EIS we are discussing now is supposed to cover it. It is ridiculous to claim to be able to anticipate local and regional conditions 20 years down the road especially in this era of rampant development. Additional EISes should be performed as part of the actual reactor license review process.

Thank you.
Sincerely,
Ann Karp

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Federal Register Notice: 72 FR 52586
Comment Number: 74

Mail Envelope Properties (477DE8A4.HQGWDO01.TWGWPO04.200.2000016.1.11E531.1)

Subject: Comments on the Vogtle EIS
Creation Date: 12/29/2007 9:15:15 AM
From: Ann Karp <annelizabethkarp@hotmail.com>

Created By: annelizabethkarp@hotmail.com

Recipients
<VOGTLE_EIS@nrc.gov>

Post Office
TWGWPO04.HQGWDO01

Route
nrc.gov

Files	Size	Date & Time
MESSAGE	4642	12/29/2007 9:15:15 AM
TEXT.htm	5442	1/4/2008 8:04:52 AM
Mime.822	11945	1/4/2008 8:04:52 AM

Options
Priority: Standard
Reply Requested: No
Return Notification: None
None

Concealed Subject: No
Security: Standard

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