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**Date:** March 03, 2008  
**To:** US Nuclear Regulatory Commission  
**From:** Chatham County Board of Commissioners  
**Subject:** Shearon Harris Nuclear Power Plant, Unit 1 U.S. Nuclear Regulatory Commission Draft (NRC) Generic Environmental Impact Statement (GEIS) for License Renewal of Nuclear Plants, Supplement 33

At their March 03, 2008 meeting, the Board of Commissioners adopted and is herewith submitting comments for your consideration on the U.S. Nuclear Regulatory Commission (NRC) Draft Generic Environmental Impact (GEIS) for License Renewal of the Shearon Harris Nuclear Power Plant, Unit 1 (Supplement 33)

Background

The Generic Environmental Impact Statement (GEIS) and Supplement concern Progress Energy's November, 2006 request for an extension of their license to operate the Shearon Harris Nuclear Power Plant, which expires in 2026. They are requesting a 20-year extension to operate through 2046. This Supplement to the GEIS addresses issues specific to the Harris Plant.

Comments:

The timing of this request for an extension of the operating license is inappropriate. Major changes in the condition of the plant and its safety systems, availability of sufficient water to operate the plant safely, the size and vulnerability of the human population surrounding the plant, and the presence of Federally- and State-listed threatened and endangered species near the plant and in transmission line rights-of-ways, could occur before the expiration of the current license in 2026. During the next 18 years the area served by the Harris Plant could implement substantial energy conservation measures, bringing the area more in line with energy use patterns in other industrialized nations. For example, if light sources for new construction and replacement bulbs were compact florescent lights (CLF), two-thirds of the energy requirement currently needed from regular florescent bulbs would be eliminated, resulting in a 67% energy savings. Furthermore, renewable power generation technologies could be developed. The license extension should not be considered until at least 2018, by which time the future need for the Harris Plant and its potential impact on environmental health could be more realistically evaluated. At that time further changes in these parameters during the renewal period, 2026-2046, could be more adequately projected and assessed.

Spent fuel storage at the Harris Plant is a particular long-range concern. Commercial reactors were licensed under the assumption that the federal government would provide a permanent storage site for spent fuel, which remains hazardous for hundreds of thousands of years. Such a site has not yet been provided. Harris is providing temporary storage for its own spent fuel in addition to fuel from other reactors. Storage of massive quantities of fuel under water presents serious safety concerns, as noted in federal reports and the work of independent scientists. Granting a license extension for a facility that produces materials that will remain highly dangerous for far longer than

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the entire span of recorded human history in the absence of a long-range plan to protect the environment and human health raises serious concerns.

The sections of the report that address socioeconomic characteristics and environmental justice are based on data from the year 2000. They are already out of date. Rapid growth of the Chatham County population, and issuance of permits for additional housing that has not yet been built or occupied, are not taken into account in this Supplement. The Triangle J Council of Governments projects that the population of Eastern Chatham will more than triple by 2035. Changes in population size could drastically affect the ability to evacuate people in the event of radiation releases. The Supplement does not assess the impact of evacuation on infants and toddlers, school children, the elderly, or institutionalized populations. These deficiencies must be addressed.

Environmental justice analyses in this report use an inappropriate criterion of 50% people of color or Hispanic people to evaluate impact. Environmental injustice can occur when these populations are below 50% but still disproportionately located near a hazardous site. The Supplement does not cite the substantial literature on assessments of environmental injustice in North Carolina based on continuous measures of population characteristics rather than an arbitrary 50% value.

Finally, with regards to environmental impacts of operation, many of the issues considered applicable to all plants should be subject to more site-specific review. In Chatham County, we are especially concerned with the impacts of transmission lines on water quality, and aquatic and terrestrial resources, all of which require site-specific analysis.