

RAS-Q-11

618 McLaws Street
Savannah, GA 31405
May 7, 2008

Office of the Secretary
Attn: Rulemaking and Adjudications Staff
Mail Stop O-16C1
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

DOCKETED
USNRC

May 12, 2008 (Pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Re: Vogtle ESP Comments-Docket # 52-11

Sir:

I am opposed to Southern Nuclear Operating Company's plan to add two new reactors at Plant Vogtle. No matter which of the new reactor designs are chosen, the reactors will still have emissions that will be released into the air and water. The water emissions will eventually make their way down the Savannah River and affect the Savannah area.

Fishing has long been popular here and as a society we encourage our children to get hooked on fishing instead of drugs. They will not want to get involved with fishing knowing that their catch will be contaminated with more nuclear reactor byproducts. Since the water discharged from the plant is already thermally hotter than that taken in for cooling it will adversely affect the fish and other marine and plant life in the river. The water intake systems for nuclear power plants have also been known to kill fish, their larvae and other organisms in the water. Adding more reactors will make both of these situations even worse. What about those who live along the Savannah River who get their main food supply from fish? By approving the plan for new reactors you are basically telling them "Tough luck! we don't care, move somewhere else!"

As you may know, many parts of Georgia have been and continue to be hid hard by drought. Even though it has recently been alleviated a bit and the state is considering relaxing some of the water use restrictions, we are still not out of the woods yet. Since we are technically still in a drought, building more nuclear reactors that consume even more water than a fossil fuel-burning power plant is the last thing we should be doing. It will only make the drought worse and lead to even harsher water use restrictions.

Under normal circumstances the new reactors would put Savannah and other downstream communities at risk from increased radioactive emissions in the Savannah River and less river water to withdraw for their own use if they need to. Now that Atlanta and other North Georgia communities want to draw water from the river they too will be at risk. This demonstrates that the company is being irresponsible because now their plan threatens the entire state. I am sure that North Georgians do not want radioactive contamination in their drinking water and especially do not want more reactors making the problem even worse.

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From the time Southern Nuclear Operating Company first announced its intention to add new reactors at Plant Vogtle I have been opposed to their plan in general and their pursuit of an Early Site Permit. However, even if I were in favor of their plan and them getting this permit I have no confidence that they will be able to bring the project in under budget. This will cause Georgia Power to raise their rates, again. Georgia Power had its largest rate hike when Vogtle became operational. With that track record, how can anyone expect anything different? Here is another way the company is being irresponsible, this time with ratepayers' and their shareholders' money.

The company is also putting Savannah and the surrounding region at risk from an accident or terrorist attack at the plant. There will be more reactors that are subject to accidents and, of course, more reactors make the plant a more attractive target for terrorists. More reactors also means more spent fuel will have to be stored on-site since a "solution" to the problem of high-level nuclear waste is very unlikely to be found in our lifetimes. I find it appalling that the Commission has refused to address or even consider this very important issue in previous cases!

When Chatham County had a mandatory evacuation in September 1999 because of Hurricane Floyd threatening it took my family five hours to travel from Savannah to Pembroke, a distance of about thirty miles. That was two days in advance of the hurricane's anticipated strike and during the daytime. Evacuating when a hurricane threatens is bad enough. In case of an accident or terrorist attack at Vogtle, its spent fuel or the Department of Energy's nearby Savannah River Site, with all its weapons grade plutonium and other dangerous materials, it will be problematic trying to evacuate the people living nearest to Vogtle. Now consider what it would be like evacuating Savannah and the surrounding areas of Georgia and South Carolina, with little or no warning and possibly at night. Georgians can't use hurricane evacuation routes toward Augusta, and South Carolinians will have to make up their own routes since their hurricane routes go through the Savannah River Site to Augusta. This is one proverbial Chinese fire drill that our first responders are not ready for. Another point to consider: whether we evacuate or shelter in place we will likely need to take potassium iodide which the vast majority of us don't have, thanks to the Commission refusing to extend the radius for KI distribution beyond ten miles from a nuclear power plant. Will the police, fire department or National Guard get it to us, and where? In either case, accident or terrorist attack, the full impacts to human health and the environment would be immense.

The concerns I have expressed here are what I have now based on the present situation. However, I can't possibly know what will happen in the next twenty years or more. Since the ESP allows Southern Nuclear to lock in the site up to twenty years it and the Commission must look at how things will be not just now but twenty or more years from now, especially pertaining to water use.

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How can anyone anticipate all of the environmental impacts of new reactors at the very beginning of the process, yet there is only one time to discuss and evaluate them? Once the company gets the early site permit then later on some new unforeseen problem comes up, what happens then? Just ignore it and press ahead. This is something the company and Commission simply can't afford to do.

In this time of historic drought and with the world community having reached consensus that we must start tackling the problems of climate change now, Southern Company is doing its ratepayers, shareholders and the world a disservice by proposing new reactors for Plant Vogtle and seeking this ESP. Instead of using expensive, water guzzling nuclear reactors that do not lessen the problems of, and are a false solution for, global warming the company should be investing in energy efficiency and power sources such as wind farms, solar panel stations, geothermal energy and certain forms of biomass to meet our energy needs. Efficiency investments alone would be the most cost effective and cut out the need for more nuclear reactors.

For all of these reasons I strongly urge the Commission to deny Southern Nuclear Operating Company's application for an Early Site Permit at Plant Vogtle. For the same reasons I also strongly urge the Atomic Safety and Licensing Board panel overseeing the pending legal challenge to the permit to rule in favor of the challenge and deny the permit.

Thank you for the opportunity to share these comments with you.

Respectfully submitted,



Jody Lanier

CC: Judge G. Paul Bollwerk, III
Atomic Safety and Licensing Board Panel