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Nuclear Regulatory Commission,
Washington, DC 20555-0001

July 25th 2008

Re: Progress Energy Combined License Application (HAR-2, HAR-3)
Docket 52-022, 52-023 Environmental Scoping

As residents in Progress Energy-Carolina's service area, and a county that adjoins the proposed reactor site, we are writing to urge the NRC to suspend the review of Progress Energy's license application.

Firstly, because the referenced design, the AP1000, is undergoing significant revision. In this respect, not only is the license application incomplete, but so is the "Environmental Report" submitted by Progress Energy, since a significant section depends on the plant's design, and safety systems: Chapter 6 "Environmental Impacts of Postulated Accidents Involving Radioactive Materials."

Secondly, the extent of the proposed revisions means that cost projections are virtually impossible until these design issues are resolved. Without a reasonable cost basis neither EIS scoping nor preparation can be done.

Thirdly, an equally serious unresolved issue is that of water supply for the two new nuclear plants. In addition to raising the water level of the larger reservoir to 240 ft, Progress Energy is proposing a pipeline from the Cape Fear River with a pumping capacity of up to 60,000 gpm, greater than the "net consumptive" (evaporative) needs of the two new plants, and greater than the water use of the City of Raleigh. This scheme has not been approved by the state of North Carolina.

Progress Energy also discusses in the Environmental Report an additional, or alternate, proposal, which is to divert discharge from a Western Wake Partners waste water treatment plant directly into Harris Reservoir or the Auxiliary Reservoir instead of into the Cape Fear River as the state of NC requires.

Neither of these additional water sources has been approved or permitted, and may never be. Therefore it appears that it is premature for the license review to proceed, until these water supply issues are resolved, and state water quality permits have been issued, or not. In addition, preparation of a draft Environmental Impact Statement cannot proceed, because you cannot predict environmental impacts from processes that are unknown. It appears that water supply for two new reactors would be insufficient from merely raising the reservoir system level to 240 ft throughout.

Fourthly, we also contend that the application is also incomplete because of the major deficiencies of the Environmental Report submitted by Progress Energy. There are numerous inconsistencies and omissions, between sections and chapters, between

sections and summaries, factual errors, and inconsistent findings, impacts or activities that appear in one section but not in another, appear in text but not in tables, and generally make NRC review impossible.

One of the most significant areas of deficiency in the Environmental Report is the lack of a realistic cost estimate for the two new nuclear plants and the associated construction and operational activities and costs that are scattered about the text or tables, either stated or by inference. Instead Progress Energy has created an estimate based on old reports that is totally inadequate and in conflict with estimates for identical design plants currently proposed by other utilities, including Progress Energy in Florida.

The NRC cannot possibly accept the cost of a new AP1000 design nuclear plant (and associated costs as described in the Environmental Report) as a mere \$2.2 billion, when the costs of the same plants in Levy County, Florida has been submitted by Progress Energy-Florida to Florida state regulators at \$8.5 billion each. The contract with Westinghouse alone for those Florida reactors is \$3.45 billion per reactor. Now it appears that until the resolution of design issues even those escalating costs are not a reliable guide to future costs.

However, the lack of any reasonable cost basis, or floor, means that there can be no reasonable analysis of comparative sources of energy generation or energy management strategies, either alone or in combination with sustainable renewable energy sources.

Preparation of an EIS cannot proceed without a realistic cost estimate, and should include an alternative that utilizes a more comprehensive slate of available efficiency measures by customers of all classes.

The costs, impacts, and requirements for the renewable energy alternatives are particularly inaccurate in the Environmental Report, with inflated land requirements for wind and solar, and conclusions that the waste impacts of wind and solar are greater than that of a nuclear power plant!

On the other hand, Progress Energy includes only the 192 acre footprint for the land use impact of the new reactors, omitting the thousands of acres to be flooded, paved, taken for new transmission line right of way, relocated buildings and facilities etc. In addition, Progress Energy has substituted their calculation of land requirements for flat plate or tracking photovoltaics, for solar thermal plants which is a completely different technology.

These are just a few examples of the additional deficiencies of Progress Energy's submittal, which renders suspect many of the areas of the Environmental Report that are less easy to check, and means that the license application that the NRC is reviewing cannot be relied upon for accuracy or completeness.

It is ultimately the cost to ratepayers that counts, and the legacy of the nuclear waste from 60 years of operation alone should make nuclear power the least attractive option in any thorough and unbiased analysis, and frequently has shown to be the most expensive and destructive option.

We further believe that Progress Energy has not demonstrated the need for an additional 2000 MWe of baseload generation, as they have only provided peaking data. The North Carolina Utilities Commission has not ruled that 2000 MWe is needed to be constructed, and Progress Energy has not filed data with them on their baseload,

rather than peaking demand.

The NRC should halt review of the license application until it is complete and accurate, and a good faith submission. The NRC should also suspend license review for these two new nuclear plants for which there is currently no approved adequate water supply, in addition to no “certified” design, nor cost.

We believe that the NRC’s major responsibility is protecting the public and future generations from unnecessary and excessive exposure to radioactive materials and pollution, and ensuring the safety of the nation’s aging fleet of operating reactors.

We believe that the mass, fast-tracking, license application review for a large number of new, and untried nuclear plants, based on a new, moving-target design, does not further that goal, and indeed could interfere with it.

Nor does it serve the public interest or health to ensure the creation of yet more tons of highly irradiated and long-lived waste.

We believe that nuclear plants do nothing to reduce carbon emissions, especially when they are to be operated in tandem with coal plants, and that nuclear power will not accomplish any of its claimed benefits.

Signed:

John Bonitz
Liz Cullington
Patty Dukes
Don Eads
Margie Ellison
Ed King
Nick Meyer

Planning Members of the Chatham Alliance for Sustainable Energy

The mission of the Chatham Alliance for Sustainable Energy (CASE) is to work for a new, more positive and secure energy future for all residents of Chatham County.