

HarrisCEm Resource

From: Haw River Assembly [info@hawriver.org]
Sent: Friday, July 25, 2008 5:57 PM
To: HarrisCOLEIS Resource
Subject: Progress Energy Combined License Application

July 25, 2008

Haw Riverkeeper,
Haw River Assembly
P.O. Box 187
Bynum, NC 27288

Office of Administration,
Mailstop T-6D59,
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

July 25, 2008

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

The Haw River Assembly and Haw Riverkeeper have long-standing concerns about the safety of the current existing Shearon Harris Nuclear Power Plant including transport, radioactive waste storage and faulty construction and maintenance. All these issues pose dangers to the Haw River watershed that we have worked to protect since 1982.

Given the problems at the current Progress Energy facility we do not have confidence that additional plants should be built without rigorous examination. We urge the NRC to suspend its review of Progress Energy's Combined License Application for the following reasons:

1. 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."
2. The water supply for the two new nuclear plants has not been established. 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 withdrawal 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. North Carolina continues to suffer from low water table conditions due to persistent drought, and all new water withdrawals must be considered in this light. An alternative proposal to divert effluent discharge from a Western Wake Partners

waste water treatment plant directly into Harris Reservoir or the Auxiliary Reservoir has not been approved either, and no further review of this license should proceed until water issues are resolved.

3. Preparation of a draft Environmental Impact Statement cannot proceed, because you cannot predict environmental impacts from processes that are unknown. The Environmental Report submitted by Progress Energy has numerous inconsistencies and omissions, between sections, 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.
4. There is no current answer to the problem of how to safely store the radioactive waste these plants will produce, in addition to the large amount of waste being stored on site at the existing Shearon Harris facility. This problem exceeds any other consideration concerning this proposal and must be answered before any further review takes place.

We believe the Nuclear Regulatory Commission has a tremendous duty to the public to ensure safety, now, and for future generations. There is no room for error in this deliberation and you should demand information that is complete and accurate before any further deliberation takes place.

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