PMSTPCOL PEmails

From: Paul Kallan
Sent: Tuesday, March 25, 2008 4:05 PM
To: 'Nona H Diediker'
Subject: Fwd: EIS scoping comment from SWU
Attachments: EIS scoping comments.pdf

fyi

Paul

>>> STP_COL 3/25/2008 3:02 PM >>>
fyi

>>> Lara Cushing <lara@swunion.org> 2/18/2008 4:10 PM >>>
Please see attached comment on the scope of the environmental impact assessment of STP 3 & 4.

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* please note new email: lara@swunion.org *

Lara Cushing
Southwest Workers Union
P.O. Box 830706
San Antonio, TX 78283
Tel: (210) 299-2666 Fax: (210) 299-4009
www.swunion.org / swunion.blogspot.com

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Recipients:
"'Nona H Diediker'" <nona.diediker@pnl.gov>
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SOUTHWEST WORKERS' UNION

February 18, 2008

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Chief, Rules and Directives Branch
Division of Administrative Services
Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Sent via e-mail at STP_COL@nrc.gov

RE: Comments on the scope of the Environmental Impact Statement for South Texas Project reactors 3 & 4

Dear Nuclear Regulatory Commission:

Southwest Workers Union is a non-profit, membership-based organization in San Antonio, TX representing 2,500 low income families. We are concerned by the inadequate inclusion of the public in the decision by our public utility CPS Energy to construct two new nuclear reactors at the South Texas project (STP) and the total lack of an assessment of alternative ways to meet San Antonio's energy needs in the Environmental Impact Statement (EIS) as required under the National Environmental Policy Act. **As the ratepayers that will finance this project, we have a right to a full and transparent assessment of alternatives. We also deserve and request that the NRC conduct public hearings in San Antonio on those alternatives and the environmental impacts of STP 3 & 4 as part of the scoping process.**

In the current application, it states that the purpose of STP 3 & 4 "is to sell baseload power on the wholesale market" and that demand side management initiatives such as conservation and efficiency programs therefore do not serve the purpose of the project and are not reasonable alternatives (Section 9.2.1.3). However selling power on the wholesale market is not the objective of CPS Energy, a municipally-owned utility who is currently projected to be a 50% owner of the two additional reactors at STP. CPS's mandate is to serve the energy needs of the greater San Antonio area, and its Strategic Energy Plan identifies energy efficiency as one of its four main tenets. According to its publications, CPS Energy is "so committed to this goal that energy efficiency is treated as a new resource for electrical generation." **As such, energy efficiency programs are a directly comparable alternative to the electricity that will be generated from STP 3 & 4 and need to be given full consideration in the EIS.**

A 2004 CPS-commissioned study by KEMA Inc. concluded that it was cost effective for CPS to save 1,200 mW through stronger building codes and retrofitting programs, nearly as much as CPS's 1,350 mW share of STP 3 &4's generating capacity, on a comparable if not shorter time scale. Neither this report nor a more recent analysis of efficiency is presented in the permit application. With houses that waste more energy than any other large city in Texas, San Antonio has a huge potential for energy savings from weatherization programs that would contribute to the local economy by lowering family's energy bills and creating "green collar" jobs in San

PO Box 830706
San Antonio, TX 78283

Ph. 210..299.2666
Fx 210..299.4009

www.swunion.org

Antonio. Despite this, CPS has currently dedicated only $96 million over a four year period to energy efficiency measures, a fraction of the $206 million allocated just for initial site design of STP 3 & 4.

The EIS needs to include a thorough analysis of alternatives specific to meeting San Antonio's energy needs that includes proactive weatherization and retrofitting programs, stronger building codes, combined heat and power or cogeneration strategies, renewable energy production, and combinations thereof. This analysis needs to receive as much consideration in terms of technical expertise, time and financial investment as the proposed new nuclear reactors have received. STP 3 & 4 would be a huge financial investment for San Antonio ratepayers and will with all likelihood greatly overrun initial cost and time projections, preventing CPS from making large scale investments in efficiency and a renewable energy future. We deserve a full analysis of those different futures, free of radioactive waste, the pollution associated with uranium mining and enrichment, weapons proliferation, and the danger to public health and the environment from leaks and accidents at STP, before this project progresses any further.