

RAS #AA-09

**Hearing Docket**

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**From:** Louise Gorenflo [lgorenflo@gmail.com]  
**Sent:** Monday, August 04, 2008 7:24 AM  
**To:** Paul Bollwerk; Hearing Docket  
**Subject:** Limited Appearance - BLN  
**Attachments:** Limited Appearance.doc

DOCKETED  
USNRC

August 4, 2008 7:24 am

Limited Appearance  
Bellefonte Nuclear Plants Units 3 and 4  
Docket No. 52-014--COL and 52-15-COL

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Docket No. 52-014-COL and 52-015-COL

To: Paul Bollwerk, Chair  
  
Atomic Safety and Licensing Board

See attached

Temp = Sec 4-038

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(148.184.200.145) with Microsoft SMTP Server id 8.0.751.0; Mon, 4 Aug 2008  
07:23:54 -0400

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Date: Mon, 4 Aug 2008 06:23:43 -0500

From: Louise Gorenflo <lgorenflo@gmail.com>

To: paul.bollwerk@nrc.gov, hearingdocket@nrc.gov

Subject: Limited Appearance - BLN

MIME-Version: 1.0

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Return-Path: lgorenflo@gmail.com

Limited Appearance  
Bellefonte Nuclear Plants Units 3 and 4  
Docket No. 52-014--COL and 52-15-COL

DOCKETED  
USNRC

To: Paul Bollwerk, Chair  
Atomic Safety and Licensing Board

August 4, 2008 7:24 am

From: Louise Gorenflo, member  
Bellefonte Efficiency & Sustainability Team

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Docket No. 52-014-COL and 52-015-COL

Date: August 4, 2008

Dear Mr. Bollwerk:

I attended the ASLB 's hearing in Scottsboro on July 30, 2008 in Scottsboro, AL, and was impressed by the board's efforts to delve into the issues and concerns presented them. Also, I appreciate the opportunity you afford those who want to further comment on the BLN application.

As the principle author of the contentions on the need for power and alternatives to the proposed action, I do want to offer some comments.

But, first I need to say that I would not qualify as an expert in these matters. We could not afford retaining the services of such an expert. BEST is all-volunteer and lacks the resources that NuStart and TVA enjoy. The suggestion made by the NuStart lawyer at the hearing that we prepare our own power projection points to the unevenness of the playing field.

**1. TVA's power projections fail to justify the need for new units.**

a. TVA's power projection does not integrate the contributions of energy efficiency and demand side management in meeting future needs. TVA's failure to even estimate how energy conservation, energy efficiency, and demand side management might affect the need for supply makes its power projection lacks. TVA's offering of a power projection without these strategies hearkens back to an earlier time.

b. TVA does not adequately describe how the completion of Watts Bar 2 will affect the need for additional power. TVA power projections need to be revised to reflect that additional supply of power.

c. At its May 19, 2008 meeting, the TVA board adopted energy efficiency and demand response targets to reduce peak demand by 1400 MW and power consumption by 4,300 GWh by 2012, the equivalent of a nuclear unit. TVA's power projections need to be revised to reflect these reductions in power supply need.

d. TVA estimates the medium average annual net system requirement growth rate (ER Part 3, 8.2-14) to be 2.0% between 2007-2010, 0.3% 2010-2014 (reflecting the lost

of USEC its largest industrial customer), and 1.7% 2014-2020. In the DOE Energy Information Administration's Annual Energy Outlook 2008, total electricity sales increase by 29 percent in the *AEO2008* reference case, from 3,659 billion kWh in 2006 to 4,705 billion in 2030, at an average rate of 1.1 percent per year. TVA's power projections need to be revised to reflect the reductions forecast by the EIA for growth in electricity consumption.

e. Our contentions made extensive referrals to the *Environmental Standard Review Plan* because, for those SRP sections cited, it appears that TVA has not addressed concerns identified as important by the SRP. While the NRC staff discount the importance of the SRP in judging the adequacy of an application, the fact that the TVA does not address a large number of SRP concerns does reflect our concern that the TVA has not demonstrated a need for additional power supply.

**2. TVA's power projections need to be reviewed by a third party.**

a. No entity external to TVA has provided an expert review of TVA's power projections because it is unregulated.

b. It is unlikely that the NRC staff can do an expert review of the need for power as in all other applications, the NRC staff relies upon public service commissions to have made this review.

c. The lack of external review of TVA power projections in the 1970s led to the cancellation of eight units and the enormous debt TVA rate payers now bear.

d. The GAO has the ability to conduct such a review.

**3. TVA needs to review alternatives to the proposed action in light of rising costs.**

a. At the ASLB hearing, the NuStart lawyer and a month earlier TVA Vice-President Jack Bailey asserted that the BLN reactors to be built by Westinghouse are expected to cost \$3 to \$5 billion each (\$3,500 per kilowatt.)

b. The Federal Energy Regulatory Commission in a June 19, 2008 report (*Increasing Costs in Electric Market - Item No. A-3*) estimates the overnight cost for new generation. Its estimate for nuclear construction is within a range of \$5,000 to \$8,000 per kilowatt.) The cost for concentrated solar is \$3,000 to \$5,000 per kilowatt. The cost for wind is \$1,500 to \$2,500 per kilowatt.

c. For a discussion on the FP&L cost estimates, see *Energy Biz*, an industry trade journal: [a4nr.org/library/economics/may.june-energybiz](http://a4nr.org/library/economics/may.june-energybiz).

d. TVA claims that components of BLN 1 and 2 can be used by unit 3 and 4, such as the cooling towers, which will reduce costs. However, NRC staff recently discovered that TVA used inaccurate data to determine flooding: "The staff also notes that if the 1.3 foot error is taken into account, the Bellefonte Units 3 and 4 site would be flooded at the lower bounds of the inspections, tests, analysis and acceptance criteria (ITAAC) value for site elevation of +/- 3.5 feet...The staff believes that as TVA updates the PMF calculation, it should

revisit its options to ensure that either the site remains dry by elevating the site or consider installing flood protection, if the PMF values stay near the values currently calculated." (July 18, 2008, Accession No.: ML081910814). Thus the savings that TVA counted upon may be washed away by the need for redoing the site's groundwork.

Again, I thank you.

Sincerely,

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931/484-2633