

RAS #AA-21

**Hearing Docket**

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**From:** Linda Modica [linda.c.modica@mac.com]  
**Sent:** Wednesday, August 13, 2008 4:18 PM  
**To:** Paul Bollwerk; Hearing Docket  
**Subject:** Docket No. 52-014--COL and 52-15-COL, Bellefonte Nuclear Plants Units 3 and 4, Limited Appearance Comments



LWV of Northeast Tennessee  
Linda C. Modica, President  
266 Mayberry Road  
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DOCKETED  
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August 15, 2008 6:07 pm

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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

August 13, 2008

The Honorable Paul Bollwerk  
Chair, Atomic Safety Licensing Board  
The Nuclear Regulatory Commission

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

Dear Judge Bollwerk:

The League of Women Voters of Northeast Tennessee appreciates the opportunity you have extended for comment from the public, in the matter of license applications for new nuclear power plants by the Tennessee Valley Authority. Our organization has been strongly supportive of the TVA's initiative, since the year 2000, to develop renewable energy sources for electricity, in its Green Power Switch program. We are strongly opposed, however, to expansion of nuclear energy production by the agency. Please accept our considerations, below, against license approval for the proposed Bellefonte generation facilities.

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We hold that need for more energy must be shown before new nuclear-generation facilities are built, as the extraordinarily high cost of their construction and future operation will be borne by the rate payers. We can point to many local and regional examples of investments in building-lighting-appliance efficiency, both public and private residential, through which electricity consumption has been lowered, even up to 30 percent. Nationally, the trends in electric-energy planning and investment are in this direction, with expectation and examples that future consumption can be substantially reduced, or at least remain steady. From the perspectives of holding down costs, and of avoiding added climate-related and other environmental harm, we urge that need for new plant construction be proven by TVA, after promotion and investment in efficiency measures commensurate with technological and other opportunities in that regard.

In its announcement of an imminent, large electricity-rate increase, the TVA has indicated rising costs of fuel and prolonged drought as reasons for the rate hike. Both these factors, but especially drought exacerbation under continued climate warming, argue for an electricity infrastructure less -- and certainly not more -- dependent on water. At this time, as per the *TN Statistical Abstract*, more than 82 percent of daily water withdrawals from our lakes and rivers goes to the making of electricity from TVA's power plants.

Drought-related power-reduction incidents in Europe, and the Tennessee Valley Authority's own experience at Brown's Ferry in 2007, have shown that dependence on nuclear generation at times of drought (&/or high temperatures in bodies of water used for cooling) can necessitate importation of replacement power, by the utility, again at large financial cost. The Bellefonte area is suffering from extended drought. New, additional nuclear plants would be vulnerable to periodic -- perhaps even lengthy -- generation curtailment if drought conditions continue or worsen.

**The League urges denial of licenses for the proposed plants, due to the water-dependency liability, as well as their broad and harmful thermal impacts on water bodies.**

We are aware of past safety failures and accidents at the TVA's (and other utilities') nuclear facilities. These, added to routine and cumulative, if small-scale leaking of radioactive substances into air and water from many plants, and to vulnerability from terrorist attack, make nuclear generating stations a significant risk to public health and safety in our time. We hold it to be cheaper, safer, more affordable, sustainable long-term and therefore wiser, to work to meet our need for electricity via means other than expansion of nuclear power.

**Therefore, the League of Women Voters of Northeast Tennessee respectfully urges that the license applications for the proposed Bellefonte reactors be rejected.**

Thank you for considering the comments from League of Women Voters of Northeast Tennessee.

Sincerely,

*/s/ Linda C. Modica*

Linda C. Modica, President, LWV NETN

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

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

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