

**NRCREP Resource**

**From:** Lea Foushee [lfoushee@Nawo.org]  
**Sent:** Sunday, September 21, 2008 10:05 PM  
**To:** NRCREP Resource  
**Subject:** Fwd: DG-1149 Prairie Island EIS

Begin forwarded message:

**From:** Lea Foushee <lfoushee@nawo.org>  
**Date:** September 21, 2008 8:11:43 PM CDT  
**To:** [NRCREP@nrc.gov](mailto:NRCREP@nrc.gov)  
**Subject:** DG-1149 Prairie Island EIS

7/22/08  
43 FR 42628

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These comments are in addition to the verbal testimony given on July 30, 2008 at the Red Wing Public Hearing on the Relicensing of the Prairie Island Nuclear Plant as well as a written information sheet that NAWO was requested to produce by the public on Tritium. The document was given to the Hearing Record Court Reporter, and is titled Health Risks of Tritium.

I was unable to access the Annual 2007 Routine Radioactive Effluent Release Reports for Prairie Island Nuclear Reactors in a timely fashion for the Public Hearing in Red Wing on July 30th, even after calling the Minnesota Department of Health, George Johns, the Nuclear Management Company staff person, Amy Hass, both her office line and cell phone, and the Office of Public Assistance at the Nuclear Regulatory Commission, Scott Burnell. I have been told multiple excuses why these "routine" documents were not posted on the ADAMS electronic website in advance of the Relicensing Hearing, perhaps the most disturbing was sensitivity screening or scrubbing. It was made abundantly clear that I would not be given access to this document before the Public Hearing was over.

The VP of Plant Operations, Mike Wadley sent them to me immediately "the morning after" the Public Hearing was over, too late for questions or media coverage of the contents. After reviewing the actual documents, I realize the "why" of their lateness and lack of availability. There was an undetected gaseous radioactive leak that went on for six months that released 3,000 cubic feet of radioactive gas (extrapolation). There was an additional failure that caused a liquid release in 2007. The radioactive effluents reported in both abnormal releases to the environment were extrapolations, NMC Engineering staff calculations. The NRC staff professed that no number scrubbing would ever be done by them, but if Utility staff has to make them up, the numbers are effectively scrubbed, and we will not know what the real releases to the public health and environment may have been. In 2006 during a routine refueling cycle there were 10 abnormal releases of radioactive effluents due to breaking reactor parts.

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ERIDS = ADM-03  
1 Add = R. Plauer (rap10)

It is also disturbing that there is no longer a total number calculated for number of curies per year from the reactors in question of all isotopes released in the annual radioactive effluent release report document contrary to previous years. A lay person must calculate scientific notation across all releases and quarters to get a total number of curies released. A site specific EIS must contain total curies for all Routine Radioactive Effluent Releases (solid, liquid and gaseous) since the opening of the facility and projections for potential minimum and maximum releases for the additional years that the facility is requesting operations into the future. There must be a discussion about the total radioactivity released that is remaining, still circulating in the environment from those historic releases, and where the concentrations of such releases have been deposited. Without this information provided the document is inadequate in terms of identifying health risk to the public as well as other living creatures. Furthermore we were assured/promised (Brian Holian, Our Regional Director) specific monitoring of the routine radiation effluent releases would be done in a site specific EIS for Prairie Island, including dispersion isopleths to determine where the hundreds and sometimes thousands of curies of radiation actually go in our environment.

Additionally I was assured (Nathan Goodman) that a real Environmental Justice analysis would be performed for the Prairie Island plant specific EIS. If this is in fact correct, the entire nuclear fuel chain must be assessed for the specific additional exposure risks including the point of origin of the uranium ore and its enrichment and fabrication into fuel, transportation of the fuel, and the ultimate transportation and disposal of all radioactive wastes generated throughout the relicense period. The risk of radiation exposure to Indigenous Peoples, other Communities of Color, and economically disadvantaged individuals from this expansion far exceeds the fifty mile radius proposed for such an analysis. The fifty mile limitation biases the Environmental Justice analysis and excludes many impacted EJ Communities whose health will be affected by this proposal.

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