Fermi3CEm Resource

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Chief, Rulemaking, Directives, and Editing Branch
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Office of Administration
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U. S. Nuclear Regulatory Commission
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Comments regarding the Scoping process for the proposed Fermi 3 nuclear plant in Monroe, Michigan.

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Water Resources

- The Environmental Impact Statement (EIS) must address the cumulative impacts of water usage by the proposed plant and existing power plants in Monroe, Toledo, Bay Shore, and Port Clinton.
- Water intake and usage analyses should include Lucas, Ottawa, and Wayne Counties as well as Monroe County.
- The EIS should take into account predicted decreases in Lake Erie water levels due to global warming – 3 to 6 feet over the next 60 to 70 years – when considering the implications for water intake and thermal releases.
- The analysis should focus on western Lake Erie, the shallowest part of the lake, rather than using the entire lake in its overall analysis.
- Data on phosphorous in the application is out of date. Dissolved phosphorous levels have been increasing.
- The cumulative impact of another fish kill source should be considered, and the impingement and entrainment data from Fermi 2 needs to by updated.
- The impact on the Maumee Bay estuary should be included in the analysis.

Alternatives Analysis

- The comparison to renewable sources should be based on a mixture of renewables and conservation rather than comparing nuclear to one alternate source at a time.
- There is no need to saddle ratepayers and taxpayers with the cost of this plant when less expensive and more environmentally sensitive alternatives are available.

The Reactor Design

- The application proposes the use of an Economic Simplified Boiling Water Reactor (ESBWR), a design which is not yet complete and which has not yet been certified by the NRC
- Five other proposed uses of this design around the country have been cancelled, and the

Department of Energy has indicated that this design will not receive any of the nuclear loan guarantee funding already approved by Congress.

- DTE will inevitably have withdraw this design and resubmit the application, making this current process a waste of time and taxpayer money.

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