

Hearing Docket

From: Lisa K. [cherrytreesinspring@yahoo.com]  
Sent: Friday, March 13, 2009 2:57 PM  
To: Hearing Docket; Paul Bollwerk; Wen Bu; Emily Krause  
Subject: Re: Plant Vogtle Expansion - March 22-23 public comment

*Docket 20-52-11-ESP*

Sorry, that should be signed:

DOCKETED  
USNRC

Lisa Kishoni  
3026 Oak Hampton Court  
Duluth, GA 30096  
(404) 881-7537

March 13, 2009 (2:57pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

--- On Fri, 3/13/09, Lisa K. <cherrytreesinspring@yahoo.com> wrote:

From: Lisa K. <cherrytreesinspring@yahoo.com>  
Subject: Plant Vogtle Expansion - March 22-23 public comment  
To: hearingdocket@nrc.gov, paul.bollwerk@nrc.gov, wen.bu@nrc.gov, emily.krause@nrc.gov  
Date: Friday, March 13, 2009, 2:55 PM

Hi - I would like to submit this as my written comment regarding the proposed expansion at Plant Vogtle.

I am writing on behalf of myself and all the other property and business owners that have a vested interest in Lakes Hartwell, Russell and Thurmond. These lakes have become the economic engine for a large part of upstate SC and Northeast Georgia. In the 40+ years since the Hartwell Project has been in operation, the dam(s) have become part and parcel to our life and livelihood here. There is a current economic impact study being done by the Army Corps of Engineers and the Strom Thurmond Institute that will put a dollar figure on the actual economic impact of the reservoirs -- I am sure the number will be in the hundreds of millions per year.

The Savannah River Basin is an energy workhorse. We have Duke operating their reactors at Keowee, we have hydropower production on Lakes Hartwell, Russell and Thurmond, and we've got units 1 and 2 at Vogtle in Waynesboro. We also have the Savannah River Site, which I believe has it's own reactor and requires it's own consumptive water use. In the future, the Savannah River Site may be used as the country's first nuclear reprocessing center -- this would certainly add to the Basin's burden, and needs to be considered as we look at the future of the basin holistically.

In addition to energy supply, the Basin is the source for municipal water use in the cities of Greenville, Lavonia, Hartwell, Elberton and Savannah, among others. We also have environmental concerns such as the health of plant and aquatic life, and we need to make sure the river has the assimilative capacities it needs for handling manufacturing waste, sewage, etc., and also to prevent the salt water wedge from moving up the river further.

This Basin is not inexhaustible, and at no other time in it's history has that been more apparent than now with this current drought. River and stream flows are at all time lows. Historical modeling

will be changed by this drought. We can no longer count on certain tributaries to the basin providing what they have provided in the previous 20 years. Times are changing and we need to adaptively change with the Basin, or we risk destroying it.

In 2006 when this project first was announced, the drought was just beginning. Many of the models used in the permitting process, including the Corps Drought Contingency Plan, have been proven by the current drought to be inadequate, and the Corps has admitted that things need to change and will change in the future to mitigate droughts. Obviously, the Corps will need to react sooner and with more significant reductions in flows to mitigate the next drought, which weather modeling predicts could be longer and more intense. How will the addition of Vogtle 3 and 4 affect the upper basin reservoirs in the next drought? We don't know because the Corps has not amended their drought plan yet - we do not know what will be required of the reservoirs in future droughts.

Southern did not address the effects of their proposed expansion on the upper basin reservoirs at all in their permitting process – they just referenced the current Drought Contingency Plan, which never assumed we'd have a drought of this magnitude. This project completely ignores potential impacts on the upper basin reservoirs during periods of drought. The potential impacts for the upper basin reservoirs during periods of drought are significant, and they need to be vetted out and they have not. This is a serious flaw in the permitting process.

For example if we are in drought stage three as we are now, and we are releasing 3600cfs, as we are now, and the end stakeholders in Savannah say that due to the consumptive use of Units 1,2,3 and 4 operating at Vogtle, the City of Savannah now has less than 3600 coming in and needs The Corps to release more water at Thurmond to make up for the consumptive use of water at the plant, this affects the reservoirs. This is a scenario the Corps hydrologist has confirmed may happen. If this does happen, the Corps may need to increase releases at Thurmond so that Savannah is still getting the 3600 cfs they need for the city's water supply. No where in the permitting process was this scenario addressed and it has a direct affect on upper basin reservoir levels during drought.

With regard to the construction process, many of us in the upper basin reservoirs were dismayed to learn of Southern's request that the river be made navigable again so they can ship their reactor components up by barge from the Harbor in Savannah to the site in Waynesboro. Making the river navigable is another issue for the upper basin reservoirs, since we provide the flow required for navigation. The Federal Channel has not be maintained since the last time it was used in 1979. Southern has asked the Corps to make sure the river is navigable for their barge shipments – which may be 100 shipments over a two year period. Even without addressing the impacts of dredging to the basin, the amount of water that will need to be sent down to make the river navigable is immense. Right now we are sending down 3600cfs per day (and losing 1 foot of lake a week) – navigation requires 5600cfs per day. If we are at the beginning of the next drought (in 2011 or 2012) when these barges hit port in Savannah, I am sure Southern will not agree to wait for spring rains and steam flows to get back up, they will want the water then. This is a \$14 billion project, and we all know money talks. What happens to the upper basin reservoirs then? Who has looked into this scenario? The answer is NO ONE.

At a time when water conservation is on everyone's mind and most of the Southeast is in record

drought – why are we pursuing the most water intensive energy option available to us? Even the nuclear option could be pursued using less water – why isn't it? The Areva reactors, the ones that are going in at the Calvert Cliffs facility on the Chesapeake Bay, use 98% less water than the reactors Southern wants to put in at Vogtle. Why in the world in an era of Global warming, protracted droughts, and water conservation are we using reactors that waste so much water, when we have access to those that don't? I can tell you why, because the Westinghouse AP1000 “once through” reactors that will be used in this project are pre-approved by the federal government. This speeds up the entire permitting process for Southern. Southern wants to be one of the first six facilities to get approved, so they can get the massive government subsidies and writeoffs that the federal government has promised to the next six facilities to start production.

In closing, I would like for the Board to keep in mind those of us that live and work around these reservoirs, who see the water being let out and the lakes being run dry. We understand that the basin is many things to many people and we sincerely hope you do too. We want to protect the health of the basin, from the Tugaloo and Seneca rivers, along the Savannah River and to the Harbor. We want to make sure we use this resource in the best way possible for the benefit of all of the stakeholders. There is no doubt that we as a people living on this earth at this time need to conserve our water. We are a closed system and this drought has shown the particular vulnerability of the Savannah River Basin. Please do not approve the expansion and the use of the Westinghouse Reactors. If Southern wants to add to their Vogtle Project, they should be required to use the reactors that use less water. For them to make a conscious decision not to use that technology on a basin that is facing the most severe drought in its history is unforgivable. We all have seen with recent events in the financial markets what the pursuit of financial gain in the short term does for the entire nation in the long term. We need to make the correct decisions now so that our future includes a healthy and stable Savannah River Basin for the benefit of all of us for the next 100 years and beyond.

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From: Lisa K. <cherrytreesinspring@yahoo.com>

Subject: Re: Plant Vogtle Expansion - March 22-23 public comment

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

emily.krause@nrc.gov

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