CallawayCEm Resource

From: Missourians for Safe Energy [mail@mosafeenergy.org]
Sent: Tuesday, March 24, 2009 4:23 PM
To: CallawayCOLEIS Resource
Subject: Scoping Comments on Callaway 2
Attachments: Scoping Comments on Decommissioning.doc

Hello,

Attached please find comments regarding the scope of the EIS for the proposed Callaway 2 plant. These comments deal with the issue of decommissioning, which is just one of many concerns that needs to be addressed in this EIS process.

Thank you,
Mark Haim
Chair, MSE

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"The availability of Federally guaranteed loans, and/or a guarantee of the ability to charge ratepayers (often during construction) for the costs of a new facility, are no substitute for prudent business judgment. Simply shifting the burden of risks from the utility's shareholders and executives, to the taxpayers and ratepayers does not make any risks go away. It simply sets up yet another situation where profits are privatized while risks are socialized, allowing those who make bad decisions to walk away from the effects of their own imprudence. After hundreds of billions of such outcomes this year alone, the public has no stomach for more of this." Craig A. Severance, "Business Risks and Costs of New Nuclear Power" January 2, 2009
http://climateprogress.org/wp-content/uploads/2009/01/nuclear-costs-2009.pdf

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March 24, 2009

Chief, Rulemaking, Directives and Editing Branch
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Re: Docket No. 52-037; NRC-2008-0556
Callaway Plant Unit 2 Combined License Application

The following are prepared comments that were the basis of Missourians for Safe Energy Chair Mark Haim's oral presentation at the scoping meeting in Fulton, Mo on February 18, 2009. Due to limitations of time, only some of this was presented there.

What Assurances Do We Have that Funds or the Commitment to Decommission Callaway 2 Will be Present When the Time Comes?

One of the unique features of nuclear power plants is that they not only produce prodigious waste streams, but that the plants, themselves, become radioactive over their operational lives. Hence, every plant must ultimately be dismantled and component parts must be transported, isolated from the environment and stored for thousands of years as a very dangerous waste. This decommissioning process is one of the big unknowns in terms of the environmental impact of building and operating nuclear power plants, including the proposed Callaway 2.

It is, of course, imperative that we have a highly reliable assurance this decommissioning will be done, but, trusted assurances are very hard to come by. While in theory funds are being set aside by reactor operators to pay for decommissioning, how can we be certain that these funds will actually be available when the time comes to decommission? Recent economic events make this painfully obvious.

Consider for a moment the great uncertainties that exist regarding the state of our economy today. We really don't have any means of knowing what the long-run impact of the current economic meltdown will be. We don't know which corporations will survive the next six months, or the next two years. We don't know what the value of the U.S. dollar will be in the near future or what the state of our banks and financial institutions will be. Some posit a relatively quick and fairly complete recovery, while other, equally credible voices, posit much gloomier scenarios.

How can we possibly project the state of the economy 80 or 100 years from now? Will there be a vital, market economy with resources and energy capable of commanding the labor of willing workers and providing the wherewithal to embark on and complete a project as daunting as

disassembling and transporting hundreds of tons of massive metal castings, pipes, valves, electronics, wires, filters, concrete, etc.? Will there be a transport sector willing and capable of moving these many tons of radioactive materials to a waste disposal site? Will there be such a site capable of handling these materials and safely isolating them for the tens of thousands of years required? Even if it is feasible for our descendents to accomplish these tasks, how can we be assured they will choose to devote their labor and resources to do so?

The nuclear industry for decades has been long on assurances, short on delivery. In 1980 I was one of the coordinators of a statewide Missouri ballot initiative that would have required a licensed high level waste repository as a precondition to operating a nuclear plant in our state. I worked with hundreds of volunteers to put this issue on the ballot. Union Electric responded by assuring voters that a waste repository was just over the horizon. At that time, I believe1986 was the date they were confident we would have such a facility.

Today, we find ourselves more than 28 years down the road, and the promised repository is further off than it was in 1980. Like a desert mirage, it hovers on the horizon, but has yet to materialize. This makes other promises, including the promise to see to it that a plant will be decommissioned, hard to put faith in.

Just yesterday, Feb. 17, 2009, I attended a hearing in our state Capitol at which AmerenUE CEO Thomas Voss spoke. He was asked by a legislator about the waste from the Callaway plant and assured the House Utilities Committee that there was no problem. He described the planned facilities on site for waste storage and then said that Ameren "could store the waste on site for 100 years and I don't think that's a problem either." That's a direct, verbatim quote.

The problem is that neither Tom Voss, nor I nor anyone in this room will be around in 2122, 100 years from the date when the first waste might be removed from the core of the proposed Callaway 2 reactor. We don't know if those who are around will be inclined to, or capable of dealing with that waste. And we likewise don't know if they will move forward the promised decommissioning process. We might have Tom Voss' assurances. We might have the NRC's assurances. But the bottom line question is: who can really assure us with any certainty regarding actions to be taken a century from now? Is there not an unacceptable degree of hubris involved in thinking one can offer such assurances?

I'm sure to the Romans in the Fourth Century it seemed a no-brainer that the aqueducts would be operating a century hence. These massive waterworks had been built and maintained for centuries and who but a fool would think that coming generations would not continue to operate this critical infrastructure?

One of the reasons for my concern is that the continuity of economic institutions, including corporations like AmerenUE, and in fact the continuity of the underlying social and political institutions that form and govern our society, are often taken for granted. History has repeatedly shown, however, that we cannot assume such continuity.

The consequence of the shutting down of aqueducts is quite serious, as the absence of water can make an area uninhabitable by human populations. The consequences of not dealing with

radioactive waste or the decommissioning of a radioactive, mothballed reactor can be far more serious, even catastrophic.

Please, in considering the potential environmental impacts of building and operating the proposed Callaway 2, look long and hard at the issue of how we can be assured that, after its useful life, the plant will be decommissioned and dealt with in a fashion that will prevent the radioactive contamination of the air and water. Please explore what the impact might be of failure to do this, including the impact on humans, on other animals, on plants and on the biosphere in general. And consider, too, the possible radiological contamination of worker and the environment due to the decommissioning process.