CallawayCEm Resource

From: andyrdls@earthlink.net
Sent: Wednesday, March 25, 2009 12:19 AM
To: CallawayCOLEIS Resource
Subject: Callaway 2 COLA
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To: Chief, Rulemaking, Directives and Editing Branch
To: Division of Administrative Services
Office of Administration
Mailstop TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington D.C. 20555-0001
Callaway.COLEIS@nrc.gov

From: Andy Ayers
7036 Bruno Avenue
St. Louis, MO 63143
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Comments on
Callaway Unit 2
Combined License Application
(COLA)
Part 3: Environmental July 2008

There are many reasons to reject the proposal of a second nuclear power plant in Callaway County, Missouri.

Among the most persuasive negatives are the risks of a catastrophic radiological release either due to a major malfunction or to a willful act of terrorism. There are also serious cumulative risks from lower-level releases of radioactivity stemming from unforeseen but less than catastrophic unplanned events as well as those releases that the industry unapologetically anticipates but minimizes as "routine".

A second reactor at Callaway would place these additional risks on the rural residents of Callaway County and those who consume the agricultural products of mid-Missouri as well as increase the risks to the most populous urban concentration in the state, residents of the metropolitan St. Louis region, located downwind and downstream from the site.

The capital requirements of the proposed project are so large that the utility would prefer charging its customers for construction work in progress, a policy which would upend the public consensus to the contrary expressed through initiative petition and a vote of the electorate. This enormous commitment of capital represents opportunity costs lost to the pressing national imperative of developing market-ready sources of renewable energy and ignores the benefits of a reordering of regional energy demand that could be achieved through a comprehensive public policy of investment in energy efficiency.

To my mind, however, the single most salient case against Callaway II involves the absolute dearth of a convincing infrastructure for long term disposal of radioactive waste. This is the elephant in the room that makes it actually incredible to me that we find ourselves considering expansion of the existing collection of

commercial nuclear plants with which we are already saddled as a result of decisions made thirty, forty or even fifty years ago.

The nuclear boosterism of the post war period had largely dissolved as a result of many years of sober reconsideration on the part of energy industry analysts and public policy makers, leavened by a major shift in public opinion following the Three Mile Island incident in this country and the Chernobyl catastrophe in the USSR. There is considerable irony in the resurgent interest in civilian nuclear power springing, as it has, directly from increasing concerns about the specter of global climate change driven by ignition of fossil fuels.

In point of fact, the public policy issues raised by climate change suggest we take a direction precisely the opposite of producing additional mounds of nuclear waste, deadly for millennia and for which we have no safe disposal options. Nuclear power generation involves a potential for enormous damage to our fragile biosphere that is different but no less daunting than climate change itself. Now that the Obama administration has rejected the decades-long masquerade of Yucca Mountain as a serious waste disposal site we are back at square one.
There are no viable options for dealing with the increasing inventory of high level nuclear waste that the existing civilian power plants have already generated and continue to generate and no reasonable prospects for a change in that situation.

The implications for energy policy are clear and consonant with the approach being taken by the new administration. We need an immediate, major commitment of public and private funds to the task of wringing out the considerable efficiencies available from the energy that is currently being produced by our fossil fuel and nuclear power plants.
Energy companies like Ameren can play a major role by financing investments in energy efficiency across all segments of its customer base, industrial, commercial and residential rather than earmarking capital for additional generating capacity, nuclear or fossil.

A Manhattan project for energy efficiency offers a window of opportunity through which aggressive investment in a new generation of sustainable energy production as well as new tax policies that price both fossil and nuclear energy at a rate consistent with their true costs can finally lead to a national energy strategy that protects both our economy and our environment.

An early 21st century investment in additional nuclear capacity from Callaway County, Missouri would resemble an early 20th century investment in buggy whip production except that buggy whips are not carcinogenic for hundreds of thousands of years.

- Andy Ayers

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