PaloVerdeLRCEm Resource

From: Steve Brittle [smbrittle@yahoo.com] Sent: Friday, July 24, 2009 5:27 PM

To: PaloVerdeEIS Resource

Fw: [nonukesaz] [Fwd: Fwd: greenpeace power point on jet crashes etc] [1 Attachment] Subject:

Attachments: Palo Verde comments 2.doc

In my last transmission, it appears that the attached did not go through. OPlease add this to my comments.

Steve Brittle **DWAZ**

VIA EMAIL TO PaloVerde.EIS@nrc.gov and US Mail



Chief; Rulemaking and Directives Branch Division of Administrative Services Mailstop TWB-5B01M U.S. Nuclear Regulatory Commission Washington, DC 20555

Re: NEPA Scoping Comments regarding Relicensure of Palo Verde Units 1, 2 and 3

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Verde need to be examined, along with potential impacts and mitigation, including scenarios where there is a significant population residing near Palo Verde (within ten miles), per NEPA requirements. There have been train derailments caused by someone unknown tampering with the rail lines, a form of domestic terrorism, in western Maricopa County, that still have never been solved. So there is already a history of suspicious actions and concerns about the ability of authorities to prevent these incidents, monitor for them, or prevent them. These incidents indicate a continuing vulnerability to terrorist acts, and should be reviewed as part of the terrorism analysis performed under NEPA.

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Terrorism Risks

Please consider and address the following questions:

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just nuclear fuel, O&M (fixed and variable) is at least 3.7 cents and at most 4.9 cents per KWH, according to the Keystone report. (See page 42 of referenced Keystone report http://www.ne. doe.gov/pdfFiles/rpt_KeystoneReportNuclearPowerJointFactFinding_2007.pdf.) The Keystone report was hailed by Nuclear Engineering International and it was a multidisciplinary report. This averages higher than the average efficiency cost.

A fundamental element in finding that nuclear power is a false solution to climate change is that the economics of nuclear power are not sound – in open markets nuclear cannot compete. Since splitting atoms is not a costeffective source of electric power, it is even less cost-effective in preventing greenhouse gas emissions. Life cycle costs for nuclear power generation (in the USA) have been estimated at 12 cents a kilowatt hour; whereas life cycle costs for wind power in the same analysis is estimated at 4 cents a kilowatt hour. Others find that expanding nuclear generating capacity is about twice as expensive as expanding generating capacity through investment in wind power. Since the same money will buy 2-3 times more electric power when used to purchase wind generated electric power, it is clear that prevention of greenhouse emissions will also be 2-3times greater when buying wind generated electricity than nuclear generated electricity (as opposed to nuclear generating capacity). CO2 production per dollar is not constant. According to the Sovacool study, the average study which passed the test for quality projects that nuclear power will produce 66 grams of CO2/kilowatthour, and that wind's life cycle will produce 10 grams. CO2 output is related to KWH, not cost per kilowatthour, partly because cost is a fluctuating value, but a KWH is a fixed scientific measurement. Therefore, nuclear power will produce 66 grams CO2/KWH and wind 10 grams, which is 6.6 times the pollution output of CO2. If we can assume that wind is half the price per KWH, then the output becomes 13.2 times the CO2 output per nuclear power compared to wind. However, it is important to note that all the studies reviewed by Sovacool only assume the current ore grade of uranium to continue into the future. We know that ore grades will decline, as they have already halved over the last 30 years from 3000 ppm to 1500 ppm. The Sovaçool report also does not assume any CO2 for long-term waste management and remediation, including unintentional and intentional terrorist environmental breaches.

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The cumulative impacts of each source of electricity and/or energy efficiency need to be analyzed, examined, and compared.

The life cycle of nuclear power is not only dependent upon fossil fuels for the production of uranium fuel, decommissioning, and the disposition of wastes generated: it is also dependent upon a grid that is powered by other sources of energy, typically coal. This is due to the simple fact that nuclear reactors cannot "black start"—in other words, they depend on electric power from the external power grid to be able to come on-line. Transition away from the combustion of fossil fuels cannot be accomplished solely by the expansion of nuclear power since it depends on the grid being powered up before reactors can come on-line.

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Thank you.

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1 of 1 File(s)

Microsoft_PowerPoint_-_GP_@_SEJ_2006_FINAL_DRAFT_[Read-Only].pdf

Federal Register Notice: 74FR24884

Comment Number: 9

Mail Envelope Properties (832262.94579.qm)

Subject: Fw: [nonukesaz] [Fwd: greenpeace power point on jet crashes etc] [1

Attachment]

Sent Date: 7/24/2009 5:27:12 PM **Received Date:** 7/24/2009 5:27:15 PM

From: Steve Brittle

Created By: smbrittle@yahoo.com

Recipients:

"PaloVerdeEIS Resource" <PaloVerdeEIS.Resource@nrc.gov>

Tracking Status: None

Post Office: web38602.mail.mud.yahoo.com

Files Size Date & Time

MESSAGE 14013 7/24/2009 5:27:15 PM

Palo Verde comments 2.doc 44608

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal

Expiration Date: Recipients Received:



6205 South 12th Street - Phoenix, Azizona 85040 (602) 268-6110 Fax (602) 268-0915

Chief; Rulemaking and Directives Branch Division of Administrative Services Mailstop TWB-5B01M U.S. Nuclear Regulatory Commission Washington, DC 20555

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