

**Mendiola, Doris**

**From:** Alfred Meyer [alfred.c.meyer@gmail.com]  
**Sent:** Friday, April 23, 2010 11:53 PM  
**To:** KewauneeEIS Resource  
**Subject:** PUBLIC COMMENT: NUREG-1437, 13 Supplement 40, draft

KewauneeEIS.Resource@nrc.gov

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RULES AND DIRECTIVES  
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USNRC

RE: NUREG-1437, 13 Supplement 40, draft;

Pertaining to license renewal for Kewaunee Nuclear Power Station, Wisconsin.

In reviewing NUREG-1437, 13 Supplement 40, draft, I find there to be five significant operational site conditions which are not addressed. Due to the real and present danger each issue presents, before the Nuclear Regulatory Commission can renew the license of the Kewaunee reactor, each of these five issues needs to be satisfactorily resolved, including a process for ongoing public input in this process.

Thus I request that the NRC hold License Renewal in abeyance until there is satisfaction of these public health and safety issues:

- 1) There must be an age related management plan for of buried pipes with radiological materials to protect the public health, safety and groundwater
  - a. Tritium leaks documented in 2006 at Kewaunee
  - b. Similar tritium leaks at many other U.S. reactors
  - c. There are no current age related management plan for buried pipes
  - d. The inherent problem is that the buried pipe systems cannot be easily and regularly inspected
  - e. The "leak first, fix later" scenario is insufficient to protect public health and safety.
  - f. Tritium contamination is moving offsite towards Lake Michigan, leading to a much more pervasive problem for public safety, health and protection of the environment.

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Add = J. Doyle (did)*

- g. Therefore there is no plan for safety, health and environmental impacts of license renewal
  - h. This issue must be included in the scope and determinations of the EIS before license renewal is adjudicated
- 2) No age related analysis of submerged electrical circuits
- a. There must be a proactive inspection and maintenance program for all buried electrical circuits to ensure their good operating condition and dependability before license renewal can proceed.
- 3) Tritium contamination of the Kewaunee site is not included in the current scope of the Decommissioning Plans – adequate funding levels must be determined before license renewal is adjudicated
- a. As an example, the estimated costs of decommissioning (without acknowledging actual Tritium contamination, which is currently being recognized as a significantly more than admitted by the reactor operator Entergy, who is being sued by the state of Vermont) are \$1 Billion, whereas there are only \$500 Million in the current Vermont Yankee decommissioning fund. A thorough analysis must be provided for Kewaunee prior to license renewal.
- 4) With the likely demise of the Yucca Mountain Project, and in any case, no projected date for availability of a permanent geologic repository, the confidence aspect of the Waste Confidence Act is undermined. The EIS must now address the environmental, health and safety impacts of de facto permanent on site storage of the high level nuclear waste contained in the spent nuclear fuel before license renewal.
- a. The current standard of 60 years for SafeStore post license term must be reevaluated in light of the lack of any plan for disposition of HLNW.
  - b. Since current dry cask storage technology is based on an expected 60-year lifetime, the health, safety and public health issues implicit in the use of such limited term technology for an indeterminate time must be addressed by the EIS before license renewal is adjudicated.
  - c. Public health, safety and decommissioning funding implications of extended on site dry cask storage, during and after license periods, must be included in the EIS, in particular, the need for and environmental impacts of maintaining existing cooling pool facilities and/or building new cooling pool structures that will be needed to handle any unplanned, emergency or planned transfers of spent fuel from initial dry cask storage units to new storage and/or transport units due to premature failure of said casks, extension of storage time beyond the planned lifetime of said casks, and/or implementation of different storage and/or transport containers. Current estimates for new cooling pool facility construction is approximately \$300 Million.
- 5) Public health and safety concerns of barge shipment on Lake Michigan should there be shipment of HLNW from the Kewaunee site to a yet-to-be-determined geologic repository

- a. There is no road or rail transport capacity to move HLNW from the Kewaunee site at present.
- b. Thus, barge shipment on Lake Michigan to a suitable port, such as the city of Milwaukee, as per DOE plans, must be addressed by the EIS.

I hereby request that no license renewal be awarded to the Kewaunee Nuclear Power Station until the above noted conditions have been resolved to the satisfaction of the general public.

Sincerely,

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