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Mr. Jeremy Susco  
Environmental Project Manager  
Division of License Renewal  
Office of Nuclear Reactor Regulation  
Nuclear Regulatory Commission  
Washington, D.C. 20555

(Submitted via: [www.regulations.gov](http://www.regulations.gov))  
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Re: Environmental Scoping Review - Preliminary Comments - Nextera Energy Seabrook LLC  
Application for Operating License No. NPF-86 Renewal  
Docket No. 50-443 & NRC-2010-0206

Dear Mr. Susco:

Thank you for the opportunity to comment on the Nuclear Regulatory Commission (NRC) Environmental Scoping Review regarding the Application for an Operating License Extension for the Seabrook No. 1 Unit from year 2030 to year 2050.

It is our understanding that the scope of this initial review is to determine what environmental and safety issues will be the subject of a *supplement* to your boilerplate "Generic Environmental Impact Statement" (GEIS) which is typical for licenses and renewals on all Nuclear Power Plants. It is our understanding that these GEIS and supplemental environmental and safety issues will be analyzed in greater depth over the next year and a half, prior to granting a License Renewal for Nextera Energy Seabrook LLC for their operation of the Seabrook No. 1 Unit from year 2030 to year 2050.

While we understand that safety considerations were taken into account for the Seabrook No. 1 Unit during the initial licensing process in 1999, and that the plant has been operational without major incident for the first twenty (20) years, we believe that substantial public benefits should be associated with a potentially premature "renewal" to the current license which will not presently expire for another twenty (20) years. If the NRC is expected to extend the license commitment until 2050, several decades into the future, mitigation for this private benefit (and public risk) should be provided with some additional consideration for risk assessment and emergency evacuation capabilities within the potentially impacted communities. Newburyport, MA falls within ten (10) miles of the Seabrook Nuclear Power Plant.

While it may not be usual practice for the NRC to consider emergency evacuation planning and mitigation for a license renewal extension, this would be a mistake for both the Nuclear Regulatory Commission and the nation.

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Add = J. Susco (JJS1)

It is in both the national and regional interest that the scope of review for this re-licensing application be broader than is the usual scope for a re-licensing application. The Nuclear Regulatory Commission has an opportunity to improve the emergency evacuation capabilities for Seabrook Station and the potentially impacted communities, including Newburyport, MA.

The following relevant comments were previously submitted by Newburyport resident William Harris:

"When Seabrook Station No. 1 was licensed the primary risks were of an accidental nature. Evidence from the 9/11 Commission and other official sources indicate that Seabrook is now primarily at risk from intentional attack by malevolent adversaries. This energy facility is situated near a major population center and summer-surging beach traffic; it is accessible from low flying aircraft passing over the Atlantic Ocean; it is now less well protected by Air Defense capabilities following closure of Pease Air Force Base nearby; and it has a containment system designed before the era of terrorist hijackings of wide bodied jets. These are fundamental changes of circumstances and assumptions since this plant was licensed in year 1990."

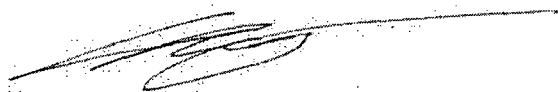
The NRC should utilize this opportunity to improve (at relatively low cost) the planning, modeling, regional sensor network, and evacuation planning for Seabrook-related emergencies. In return for granting such a large extension to the current license term, Nextera Energy Seabrook LLC should be required to assure that, if a radiation release occurs, (whether by accident or by terrorist attack) loss of life, harm to public health and safety are minimized.

In order to provide for coordinated evacuations in the event of a Seabrook-related emergency, we request that the NRC require the following mitigation, within the Seabrook region, as essential elements of review under the GEIS supplement:

1. Design and installation of plume modeling systems linked to near-real-time meteorological data;
2. Design and installation of software overrides within existing traffic signalization & traffic synchronization systems for key evacuation arteries (such signal-synchronization software could provide the added ongoing benefit of reducing vehicle congestion stops, fuel usage, air pollution, and economic losses due to regional transportation congestion);
3. Modeling and preparations (installation of signage, signalization, control systems, etc.) for "contraflow" traffic designs based on lessons learned from hurricane evacuations across interstate highway systems;
4. Installation of backup batteries or renewable signal systems, designed for operability during electric grid outages; and
5. Funding for regional emergency preparedness coordination among municipal, transportation, law enforcement and emergency response entities.

Again, thank you for the opportunity to comment on this application for license extension. We look forward to working with the applicant (Nextera Energy Seabrook LLC) and the NRC to ensure that continued operation of the Seabrook Nuclear Power Plant will be beneficial and responsible to the region as well as Nextera. Please do not hesitate to contact me at (978) 465-4400 x 223 if you have any questions regarding our comments.

Very truly yours,



Andrew R. Port, AICP  
DIRECTOR OF PLANNING & DEVELOPMENT

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