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Notice of Receipt and Availability of Application for Renewal of Facility Operating License

Comment On: NRC-2010-0206-0002
Environmental Impact Statements; Availability, etc.: Nextera Energy Seabrook; Seabrook Station (Unit 1)

Document: NRC-2010-0206-DRAFT-0006
Comment on FR Doc # 2010-17652

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Government Agency Type: Federal
Government Agency: NRC

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General Comment

Mr. Pham,

Please find attached written comments concerning the DEIS scoping process for Seabrook Station, NRC-2010-0206, along with related attachments referred to in the comments. Please let me know if you did not receive them OK.

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Attachments

NRC-2010-0206-DRAFT-0006.1: Comment on FR Doc # 2010-17652
NRC-2010-0206-DRAFT-0006.2: Comment on FR Doc # 2010-17652
NRC-2010-0206-DRAFT-0006.3: Comment on FR Doc # 2010-17652

SUNSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
Cadd = J. SUSCO (JSS1)

Bo M. Pham
Chief, Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission

September 21, 2010

NRC Docket ID: NRC-2010-0206

Re: Seabrook License Renewal Environmental Scoping Comments

Dear Mr. Pham,

On behalf of Seacoast Anti-Pollution League (SAPL), I would like to submit the following written comments on the Seabrook Station license renewal environmental scoping. These comments are submitted as expansion/clarification on my oral comments given at the afternoon scoping session on August 19th.

Among other issues, SAPL is generally concerned about ongoing air/water radioactive emissions from the Seabrook plant. Our initial perusal of available NRC documents concerning these emissions found that some years' reports did not appear to be available, and that in any case these annual summaries do not necessarily provide a complete picture of routine emissions. Regarding tritium emissions in particular, it's our understanding that there no requirements for the plan owner to report these leaks except to the extent that they are detected in the surrounding environment. Likewise, the plant owner is not required to have maintenance plan, though there appears to be a voluntary effort on the part of the industry address this ongoing problem, which is likely to grow in future years as the plant ages. What we have been able to glean from available sources seems to present conflicting figures about the quantity of tritium released earlier in the decade at Seabrook, as well as the extent of the contamination and efforts to address it at the time. Any EIS ought to provide a better picture of the situation with tritium and other common radioactive emissions, as well as the likelihood of future problems of this sort as the plant ages.

As we project into the future, which is what this re-licensing process seems to be all about, we recognize your current scoping is meant to identify future environmental impacts of plant operations, but we're more concerned about environmental impacts to the plant itself, namely, from a changing climate. If you expect to take a "business as usual" approach to re-licensing this plant , then it behooves you to adopt a BAU perspective on future climate impacts. The science is in and it should be obvious to most that our climate is changing – what we know is that environmental parameters now will clearly not be the case 50 -100 years from now.

What this means in the current context is that you ought to be planning for significant changes to sea level, groundwater and surface water hydrology, and violent storm/storm surge potential as it will likely affect the plant infrastructure and operations. The "best science" now tells us that without significant and rapid carbon emission reductions, sea level could rise approximately 1 meter by the end of this century. This may seem like a long way off, but considering the ongoing debacle of efforts to implement a long-term storage solution to spent fuel and that your recent actions allow for "temporary" waste storage on-site for up to 60 years after plant closure, it appears that Seabrook's waste storage site as well as the plant itself will likely be underwater before the waste problem is finally resolved.

Please take a look at the attached map of Hampton-Seabrook Harbor with a 1 meter sea level rise, produced recently by Clean Air-Cool Planet, a regional climate action organization with offices in Portsmouth, NH.

With magnification, you can see that the plant site is mostly covered by blue, representing sea water under the best estimate scenario at the end of the century. Currently surrounding land, including adjacent saltmarsh and equally important barrier beach are also underwater in this scenario. This eventuality is probably more significant than the overall sea level change projected, in that the plant site will be much more subject to violent storm and coastal flooding damage, even if not underwater itself. Other likely impacts to the region's transportation system, groundwater and surface water regimes, and emergency planning are hard to predict, but clearly can not be assumed to be minimal. Current projections of significant population increases in the Seacoast region will further complicate this picture, and make it all the more important that assurance of plant infrastructure integrity be maintained under this radically different hydro-geological regime.

Therefore, we urge you to address likely future climate and coastal impact issues as you develop your EIS. Without reference to currently projected climate changes, your analysis will be inherently simplistic and deficient, and it will represent a gross dis-service to future generations who will have to live with the decisions you make in this process.

On the subject of "reasonable alternatives energy sources" relative to re-licensing of this plant, which you claim to want input on, we strongly urge you to make a good-faith effort to examine current projections of renewable energy potential in the New England coastal region. This is a huge topic, but we offer one such study produced at the University of Maine last year and summarized in an AP report from December 15th. Researchers estimated that "within 50 miles of its coast, Maine has the potential wind energy of 149 gigawatts, roughly the equivalent power of 149 nuclear plants." Further, the state has already set a goal to have 5 gigawatts of wind power (4 times that of the Seabrook plant) developed by 2030, the very same year at which Seabrook is currently slated to be retired. Please also see the attached map from the U.S. Dept. of Energy's National Renewable Energy Laboratory depicting the "outstanding" wind power potential offshore of New England.

There are of course many other renewable energy technologies in the offing over the next few decades to be potentially developed in the New England coastal region, from wave power and tidal power to photovoltaic systems on existing residential and commercial rooftops. These technologies are inherently cleaner, safer, more secure and resilient, as well as increasingly more cost-effective and job-producing than continued reliance on nuclear power. If you do not make some effort in your "alternatives" analysis to explore these technologies' potential, your EIS will be highly deficient and will not pass the "laugh test" with the region's residents or public officials. Again, future generations will have to live with the decisions, good or bad, that you make in this current process, and you owe them the respect of making an honest and justifiable effort to examine the reasonable alternatives as well as the environmental impacts of maintaining the status quo in the face or a rapidly changing energy production as well as geophysical climate.

Thank you for the opportunity to provide these comments, and please do not hesitate to contact me if you have any questions or comments about this submission.

Respectfully submitted,

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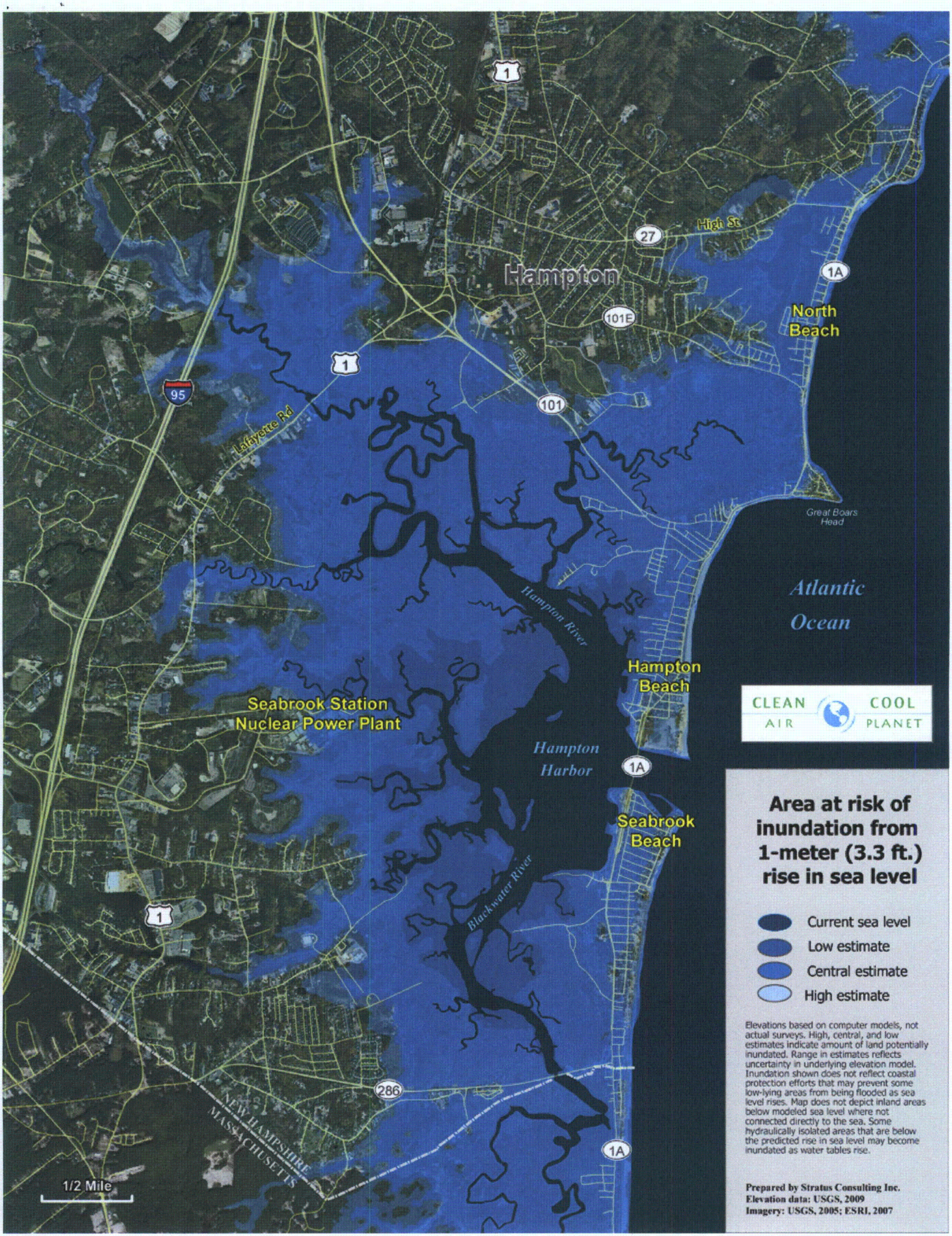
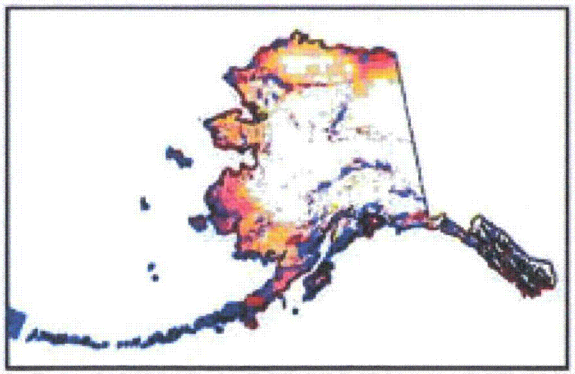

1
27
High St
Hampton
1A
North Beach
101E
1
95
101
Lafayette Rd
Great Boars Head
Atlantic Ocean
Hampton River
Hampton Beach
Seabrook Station Nuclear Power Plant
Hampton Harbor
1A
Seabrook Beach
Blackwater River
1
286
NEW HAMPSHIRE
MASSACHUSETTS
1A
1/2 Mile
CLEAN AIR
COOL PLANET
Area at risk of inundation from 1-meter (3.3 ft.) rise in sea level
Current sea level
Low estimate
Central estimate
High estimate
Elevations based on computer models, not actual surveys. High, central, and low estimates indicate amount of land potentially inundated. Range in estimates reflects uncertainty in underlying elevation model. Inundation shown does not reflect coastal protection efforts that may prevent some low-lying areas from being flooded as sea level rises. Map does not depict inland areas below modeled sea level where not connected directly to the sea. Some hydraulically isolated areas that are below the predicted rise in sea level may become inundated as water tables rise.
Prepared by Stratus Consulting Inc.
Elevation data: USGS, 2009
Imagery: USGS, 2005; ESRI, 2007

United States - Wind Resource Map

This map shows the annual average wind power estimates at 50 meters above the surface of the United States. It is a combination of high resolution and low resolution datasets produced by NREL and other organizations. The data was screened to eliminate areas unlikely to be developed onshore due to land use or environmental issues. In many states, the wind resource on this map is visually enhanced to better show the distribution on ridge crests and other features.



Wind Power Classification

Wind Power Class	Resource Potential	Wind Power Density at 50 m W/m^2	Wind Speed[a] at 50 m m/s	Wind Speed[a] at 50 m mph
3	Fair	300 - 400	6.4 - 7.0	14.3 - 15.7
4	Good	400 - 500	7.0 - 7.5	15.7 - 16.8
5	Excellent	500 - 600	7.5 - 8.0	16.8 - 17.9
6	Outstanding	600 - 800	8.0 - 8.8	17.9 - 19.7
7	Superb	800 - 1600	8.8 - 11.1	19.7 - 24.8

[a]Wind speeds are based on a Weibull k value of 2.0

U.S. Department of Energy
National Renewable Energy Laboratory