

Cyrus Reed,
Conservation Director,
Lone Star Chapter,
Sierra Club

Comanche Peak 3 & 4: Texas Doesn't Need the Power & Alternatives are Cheaper

Glen Rose Texas Public Meeting, Draft Environmental Impact Statement, September 21, 2010

Need for Power: Not growing as expected

Unlike many states, in Texas an electrical generator building a new power plant in the ERCOT competitive market does not have to convince state regulators that there is a need for the power that the proposed plant will generate. Thus, the Nuclear Regulatory Commission's required Environmental Impact Statement may be the only required public analysis of the need for the actual power. As shown by Table 8-1, the DEIS published in August 2010, finds the analysis performed by Luminant assumed a peak electricity demand of 86,803 MWs would be needed in 2024, while the peak demand found in the DEIS based on 2009 analysis was significantly less, about 81,000 MWs. Thus even since the original application, the expected demand in Texas has been forecasted to be much less than expected just two years ago.

Even with these lower projection within ERCOT, however, the DEIS overemphasizes the need for power and underestimates the expected savings from energy efficiency programs at utilities as well as savings from weatherization, demand response programs and new building codes. Thus, if these additional factors are considered, the additional 3200 MWs of the proposed two units are not needed, either for Texas as a whole or the North Central Texas region.

As an example, the analysis contained in the DEIS fails to account for three recent regulatory or legal changes that should reduce both load and peak demand in

Texas substantially in the coming years:

The June of 2010 decision by the State Energy Conservation Office to raise the minimum energy code from 2001 to 2009 standards beginning in April of 2011, which will lower overall energy use in new homes and buildings

The August of 2010 decision by the PUC to raise the energy efficiency goals of the nine Investor-owned Utilities, including ONCOR, from 20 to 30 percent of growth in demand; and

The spending of nearly \$800 million between 2009 and 2012 as part of the American Recovery and Renewal Act, which includes some \$300 million in weatherization monies, some \$300 million in energy efficiency and onsite renewable projects in public buildings, and an additional \$200 million in block grants to cities for energy efficiency.

The analysis should reflect the expected declines in demand from these changes.

Moreover, the need for power analysis is based upon the need for additional peak power, when nuclear power is intended to provide baseload power. Indeed, the DEIS should assess the expected growth in average load rather than peak power to determine additional needs in Texas.

Finally, ERCOT's analysis relied upon in the DEIS fails to consider the additional capacity that is coming on-line in wind generation, -- some 8,000 MWs of additional wind in the coming years -- and underestimates the capacity factor of wind in Texas,

Sierra Club, Lone Star Chapter

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Need for Power Overestimated

Thus, the DEIS notes that ERCOT values wind capacity at 8.7 percent of name capacity, but this number was used for a reliability figure several years ago for peak times and is not reflective of wind capacity today, both overall and at peak. Thus, the DEIS should be updated to reflect more recent trends in wind development, which would show the need for power is much less than suggested in the DEIS.

Luminant does not actually need to build two new units at Comance Peak because load growth will not grow as much as even ERCOT estimated in 2009, it does not reflect recent changes to building codes, the use of the ARRA monies and the updated goals for utilities to meet demand through energy efficiency. It also fails to consider the expanded use of wind in Texas.

The Alternatives are Cheaper, Quicker and Better

The DEIS correctly assumes that building new nuclear units is not the only option available to Luminant. However, the DEIS concludes that it is reasonable for Luminant to choose to pursue a 3200 MW nuclear facility, rather than a combination of available resources.

Thus, the DEIS notes that a recent study in Texas concluded that ERCOT could incorporate between 18,000 and 24,000 MWs of wind from West Texas once transmission lines are complete, but discounts the potential for these added wind resources to be able to replace the resources for a new nuclear plant.

In addition, while recognizing the vast solar potential throughout Texas, again the DEIS concludes that solar technology can not be part of an alternative approach because 3200 MWs are simply not available and the amount of land needed to provide an equivalent amount of land would be too large. It should be noted that the analysis was based on some recent proposed plants in California for solar, but did not account for more recent developments in solar PV utility-scale plants.

While the DEIS suggests several scenarios where a combination of wind, energy storage, solar and natural gas could replace the need for a new 3200 MW new nuclear plant, it sees no benefit in pursuing this strategy compared with the nuclear option.

But such a combination approach would

be more beneficial to Texas consumers and the environment.

First, rather than having to sink major resources into building two large, centralized facilities that might not even be needed and have no flexibility, Luminant could build up resources over time as they are needed. In addition, by combining wind, solar and natural gas, Luminant could run the natural gas units when the sun wasn't shining or the wind wasn't blowing, or when natural gas prices were low.

In addition, the use of solar and wind facilities would ==like nuclear – involve limited emissions associated with the manufacture of those products, but unlike nuclear, would not involve such large water use, nor the production of highly toxic and dangerous radioactive waste.

Recent analysis find that while the projected cost of nuclear power continues to climb, the cost of wind and solar continues to fall, while natural gas prices continue to remain low. Thus, by pursuing a flexible combination of other options, Luminant would not be locked into an inflexible, costly solution to Texas's power needs, and could also better operate a fleet of resources to respond to both average load and peak demand.



LAKE GRANBURY
MEDICAL CENTER

U.S. NRC Region IV
Texas Health Resources Tower
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

Dear Mr. Willingham,

I wish to express my support for the expansion at Comanche Peak Nuclear Power Plant.

Our country is in dire need of domestic energy sources – nuclear power is the best we have. It is a source of high-quality American jobs, and creates long-term power sources.

I know that many present are concerned about the water levels in Lake Granbury. I recently moved to a home on Lake Granbury, and my young children are looking forward to years fishing and boating on our lake. However, opposition to the Comanche Peak expansion is not the solution.

- First, the Brazos River Authority controls the sale of the river's water. If they don't commit it to Comanche Peak, they will sell it elsewhere. Opposition to water commitments should be address to the BRA.
- Second, if the water is to be used, the best solution for Granbury and Glen Rose is for the water to be used for economic development in our counties.
- Finally, Comanche Peak will be returning about 40% of the water back to Lake Granbury.

Much of the opposition to the proposed expansion stems from mis-education about the risks of nuclear power, and even a desire to change our lifestyles to dramatically reduce energy consumption. This is mis-guided. Nuclear power is a clean and safe energy source, with a manageable and containable by-product that can be efficiently stored. Significant adoption of nuclear power for base-load energy would dramatically reduce the nation's carbon footprint. Whether or not we are successful at reducing energy consumption, nuclear power is an important part of whatever ratio of powers sources we use.

Thank you for coming to Texas to allow us to present our support of the plant. I am sorry I was not able to meet you in person. Please call me at 817.579.2951 if you have any questions.

Sincerely,

David Orcutt
CEO

Good afternoon. My name is Todd Garner and I am representing the Granbury Chamber of Commerce. I am on the Board of Directors and also chair the Water & Environment Committee for the Chamber. I also live on Lake Granbury.

First, I'd like to thank the NRC for this forum and the opportunity to provide the Chamber's perspective on the upcoming nuclear plant expansion.

As you know, the Chamber's point of view is a direct representation of the aggregate viewpoints ^{of} ~~from~~ our members. Those members are comprised of businesses and individuals from the surrounding community. The Chamber strives to further the business interest of our members as evidenced by our mission statement in that we wish to provide leadership that strengthens and promotes the overall economic success of our community.

Undeniably, the future expansion of the nuclear plant will bring an economic boom to Granbury. We certainly support the efforts of Luminant as they undertake this massive endeavor. The financial impact to the Granbury area will be extraordinary.

The Chamber also recognizes that many of our members are directly or indirectly impacted by low lake levels. Business revenues, property values, and Granbury as a destination point suffer during periods of low water.

Thus, the Chamber has also been very involved in the Lake Granbury task force that has met over the past year to address lake issues. Many groups have been involved including Luminant, Lake Granbury Waterfront Owners Association, City of Granbury, and even the Brazos River Authority. Through the discovery process, the Chamber understands that lake levels have tremendous complexity and are affected by many variables.

The Chamber believes that our work with the task force is unfinished. We do appreciate that the Brazos River Authority has acknowledged a usability difference in lake levels between Lake Granbury and Possum Kingdom. We anxiously anticipate the BRA study that compares the two lakes and should make a recommendation for better methods at synchronizing water levels.

In addition, the Chamber looks to the BRA to provide information about the closure of the Morris Shepperd Dam. We believe that this was a major factor in the low lake levels during the summer of 2009.

In summary, the Chamber believes that cooperation can exist with the different entities to bring our community a significant economic boom and a healthy lake. We look forward to ongoing discussions with interested parties.

Thank you again for this opportunity.

BRAZOS RIVER CONSERVATION COALITION
PO Box 2236
Granbury, TX 76048-7236

MICHAEL WILLINGHAM
Project Manager
Environmental Projects Branch 1
Division of Site and Environmental Reviews
Office of New Reactors
U.S. NUCLEAR REGULATORY COMMISSION
Mail Stop T7-E30
Washington, DC 20555-0001

September 21, 2010

RE: Luminant's Combined License Application for Comanche Peak Nuclear Power Plant, Units 3 and 4, Somervell County and Hood County, Texas

Mr. Willingham:

The Brazos River Conservation Coalition (BRCC) is a 501(c)(3) non-profit corporation formed in 2003 with over 600 members. The BRCC's mission is to monitor and protect the water quality of Lake Granbury and the Brazos River in Hood, Parker and Palo Pinto Counties.

A thorough review of the U.S. Regulatory Commission's *Draft Report for Comment*, published August 2010, concerning Luminant's application for the addition of two new reactor units to its existing facilities at Comanche Peak Nuclear Power Plant, brings us to the following conclusions:

- That, to date, the Nuclear Regulatory Commission has relied too heavily on preliminary design and performance data furnished by the Applicants to conclude that projections of water usage from Lake Granbury and the extended Brazos River system (including Possum Kingdom Lake) will not have *large* (*i.e.*, serious) long-term negative impacts on the environs of the river, and its lakes.
- That the potential negative environmental effects of the reduced volume of water returned to the lake and river, along with increased salinity, heat discharge, salt spray mist, noise, aerosol drift, visible atmospheric plume and disposable salt accumulation associated with the preliminary design of the Blow Down Treatment Facilities (BDTF) intended to remove excess heat at the proposed plant have yet to be accurately estimated.
- That a specific case in point is the Applicant's use of the annual average wet-bulb temperature (76°F) rather than the normal summer design wet-bulb temperature (78°F) to calculate cooling water usage, indicating that a greater volume of cooling water will be needed at precisely the time of year when area and reactor water demand is at its maximum and drought conditions are most likely. In addition, the exhaust from the four large cooling towers and associated spray ponds should increase the design wet bulb temperature for the cooling towers by 1 or 2 degrees, thus increasing the cooling tower size considerably and the amount of water usage for make-up and blow-down.

- That the system for prioritizing and allocating water administered by the Brazos River Authority (BRA) clearly has not anticipated the enormous consumption of water necessary for additional reactors of the type that Luminant is proposing, and that “in the case of drought conditions” that “BRA would apportion the reductions in water availability to all of its contract customers”, including residential and municipal consumers who could be subject to water rationing while the nuclear plant has *defacto* first call on the water supply.
- That the Applicant has not developed a broad enough approach to the use of the Brazos River system as its sole source of the Makeup Water for the Nuclear Plant. Lake Whitney, with almost 10 times the capacity of Lake Granbury, should be considered as a source through a connecting pipeline to capture and recirculate the discharge from Units 3 & 4 in order to decrease the impact on our area. Shoreline development and salinity in Lake Whitney are not nearly as sensitive to fluctuations in lake level as they are in Lake Granbury and Possum Kingdom Lake.

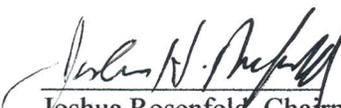
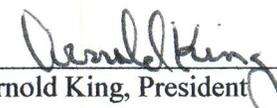
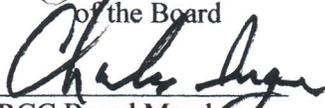
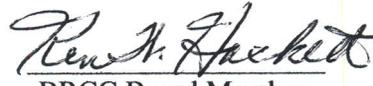
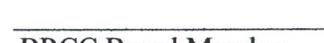
In the light of the rapid population growth affecting this area, along with ongoing depletion of the Trinity aquifer, Lake Granbury will increasingly serve as the principal source of area water supplies. The authorities responsible for the protection and allocation of our natural resources must be certain of the projected water withdrawal and its environmental impacts. Luminant’s application does not provide sufficiently accurate data, nor does it consider alternative plans to permit complete understanding of the additional reactors’ impact.

As residents of this area, we also have serious concerns about the increased build-up of on-site nuclear waste and existing critical emergency evacuation bottlenecks that will only get worse as development accelerates.

The undoubted short- and intermediate-term economic benefits to be derived from the employment, taxes and non-fossil fuel power generation associated with the development of nuclear generating plants need to be carefully weighed against the longer-term critical disadvantage of overtaxing our water resources. Therefore, we request that the NRC reject the current Environmental Impact Study until the planning deficiencies outlined above are remedied.

Thank you for your consideration of these comments concerning NRC’s Draft Report.

Brazos River Conservation Coalition:

 Joshua Rosenfeld, Chairman of the Board	 Arnold King, President	
 BRCC Board Member	 BRCC Board Member	 BRCC Board Member



GLEN ROSE Independent School District

1102 Stadium Drive • P.O. Box 2129 • Glen Rose, TX 76043
www.grisd.net

Glen Rose Independent School District Resolution – May 19, 2008

G. Wayne Rotan
Superintendent
(254) 898-3905
(254) 897-3651 FAX

Nancy Moore
*Dir. of Curriculum
& Instruction*
(254) 898-3902
(254) 897-3651 FAX

Judy Shipman
Director of Finance
(254) 898-3908
(254) 897-7419 FAX

Tommy Gibson
*Dir. of Administration
& Support Services*
(254) 898-3913
(254) 897-2055 FAX

Whereas, Luminant has announced its intention to develop a combined operating and licensing application for 2 new nuclear power units at Comanche Peak in the Glen Rose Independent School District, and

Whereas, Comanche Peak and Luminant have been a good business neighbor, providing jobs, taxes and helping the community meet its needs, and

Whereas, Texas officials have clearly stated the need for continued investment into electric generation to meet the growing population of our state, and

Whereas, if constructed, the new facilities will provide many jobs during construction and hundreds of permanent jobs after the units are running, and

Whereas, if constructed, the units will add millions of dollars in estimated spending to the Somervell County economy, and

Whereas, if constructed, the new facilities would add significant value to the property tax value of Somervell County and the Glen Rose Independent School District, and

Whereas, Luminant is consistently available to provide information and answer questions about the existing units and the proposed license application to the Glen Rose Independent School District Board of Trustees

Now, therefore be it resolved, that the Board of Trustees of the Glen Rose Independent School District endorses the combined operating and licensing application for Luminant's proposed facilities, Comanche Peak Units 3 & 4, in Somervell County,

Be it further resolved, that Board of Trustees of the Glen Rose Independent School District encourages Federal and State officials to move forward to grant appropriate licensing and permitting and approve Luminant Power's combined operating and licensing request application for Comanche Peak units 3 & 4,

Approved this 19th day of May 2008.

James L. Keffer



District 60
House of Representatives

CAPITOL OFFICE:

P.O. Box 2910
AUSTIN, TEXAS 78768-2910
(512) 463-0656
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COMMITTEES:

CHAIRMAN - ENERGY RESOURCES
BUSINESS & INDUSTRY
CALENDARS
REDISTRICTING

September 21, 2010

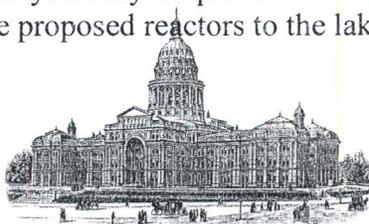
RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR COMANCHE PEAK
PROPOSED REACTORS

Dear Nuclear Regulatory Commission staff:

Thank you for the opportunity to express my concerns as the state representative for the people of Hood County who will be directly impacted by the expansion of the nuclear facility. I understand that today you are seeking public comments on the NRC's preliminary finding that there are no environmental impacts that would preclude issuing the licenses for the two proposed reactors at the Comanche Peak site located between Glen Rose, Texas in Somervell County and Granbury, Texas in Hood County.

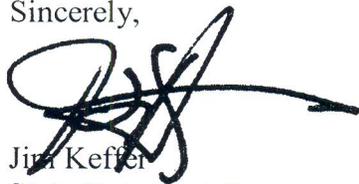
As Chairman of the Energy Resources Committee in the Texas House, I understand the importance to develop nuclear power in this state as a reliable source of energy to meet the needs of our rapidly growing population, and the Hood County community appears mostly supportive of the construction of the new reactors. I am aware that it was the original contract with Luminant, then TXU, that funded the construction of Lake Granbury, and it is Luminant's continued presence that, in part, keeps water flowing from upstream sources into Lake Granbury. In addition, the construction of the two proposed reactors will translate to a significant number of badly needed jobs and economic growth to the area and to the state of Texas. However, I want to stress the importance of mitigating the impact that the new reactors will have on Lake Granbury. The value of the lake as an essential element to the economy and prosperity of Hood County cannot be overstated. Many people have made substantial personal investments—life savings in many cases—building homes and businesses that depend on the health and robustness of the lake.

While Luminant's partnership with and contributions to the community cannot be discounted, it must be fairly balanced against the concerns of the citizens of Hood County for the preservation of the lake. I applaud the steps that Luminant has taken thus far that will serve to reduce the impact the reactors will have on the lake, such as designing a return of 40% of the new required water to the lake. I understand that you may be presented with some alternative solutions that will further reduce the impact of the proposed reactors to the lake.



I know that you will take the concerns and suggestions of the citizens of Hood County seriously and professionally. I sincerely appreciate your consideration, and I would be happy to further discuss these issues with you personally.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Keffer', with a long horizontal stroke extending to the right.

Jim Keffer
State Representative
District 60

Public Meeting for the
Draft Environmental Impact Statement for
Comanche Peak Nuclear Power Plant
Units 3 and 4 COL
Tuesday, September 21st, 2010

Commenter Name:

DAVID HUETT, PRESIDENT

Organization Name (if any):

MALLARD POINTE POA

Address:

701 PINTAIL
GRANBURY, TX 76049

Email Address:

davehuett1@gmail.com

Comment

attached

Comments submitted by :

David Huett, President
Mallard Pointe on Lake Granbury Property Owners' Association
Granbury, Texas

I represent the approximately 174 property owners of Mallard Pointe on Lake Granbury. The entire development was established on the recreational use of Lake Granbury and each property is either directly on the water or has deeded rights to a slip in the association owned marina.

We have major concerns including, first, the economic impact to the Hood County community as it is largely dependent on Lake Granbury as a tourist destination. Many businesses will not survive if the lake is not useful by residents, weekend property owners and tourists.

Secondly, there is a significant safety concern should the regular level of the lake be 1 to 1.5 feet below the historical regular level, not to mention the highly increased hazards in low rain or drought conditions. The lake, as you all know, has many trees and stumps only a short distance below the regular lake level that are hazards to boaters and skiers when the lake level is reduced.

Thirdly is the impact on property values in our development and others on the lake or, for that matter, in the whole county should the economic status be deeply affected. The BRA has done a poor job in dispelling the myth that Lake Granbury is a "constant level lake". Realtors for years have mentioned that or at least have not clearly explained the reality. When the question of possible flooding is brought up, the answer has been that the lake is regulated to a constant level and even though there may be flooding downstream, the lake level will be maintained. Examples of flooding on the river in Pecan Plantation have been sighted as the results of such an event. The discussion usually stops there.

People have invested great amounts of money for water front property as first or second homes, paying up to, and perhaps more than, \$300,000 per acre for property that provides access to the lake for visual and recreational use. This plan will have an enormous impact on those investments.

Please find a way to avoid destroying the economic investment that many thousands have made over the years. The lake has made Hood County what it is today and is vital to its future.

Thank you,

David Huett



Public Meeting for the
Draft Environmental Impact Statement for
Comanche Peak Nuclear Power Plant
Units 3 and 4 COL
Tuesday, September 21st, 2010

Commenter Name:

Danny C. Higgins

Organization Name (if any):

Hammond's BBQ

Address:

P.O. Box 2505

Glen Rose, TX. 76043

Email Address:

hammondh-bbq@yahoo.com

Danny Higgins
I reside here in the county e 2590^{w.} Hwy 07.
& have been here for the past 11 years. I am
a business owner here in Glen Rose. I
believe the Comanche Peak Nuclear Power
Plant is vital for our economic growth.
It helps create jobs, housing, even
growth in our schools. It also has a
local impact on our business here in
town. I personally know quite a
few employees ^{presently} working at the power
plant. I believe safety is their #1
priority in operating that facility.
Yes we need this expansion here
for our future growth of Glen
Rose & I might add also for
the surrounding communities.
Thank you for listening today.

Public Meeting for the
Draft Environmental Impact Statement for
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Commenter Name: Kelly Hoodenpyle

Organization Name (if any): Somervell Co. Resident + business owner

Address: Pobxy River Trading Co
114 W. Walnut St.
Glen Rose Tx 76043

Email Address: Kphoto35@yahoo.com

Comment

As a Somervell Co Resident + business owner
I would like to express my support of the expansion
of Comanche Peak. I believe it would be a great
benefit to our local economy and continue to be a
clean + reliable source of energy for the state of
TEXAS.

Public Meeting for the
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Comanche Peak Nuclear Power Plant
Units 3 and 4 COL
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Commenter Name: Jim Quirk

Organization Name (if any): _____

Address: 3426 PAGO PAGO CT
GRANBURY TX 76048

Email Address: sjquirk@wt.net

Comment
WHAT WILL THE EFFECT ON THE
WATER LEVEL OF LAKE GRANBURY BE
WITH THE ADDITION OF PLANT UNITS 3+4?