

Comments to Nuclear Regulatory Commission on Early Site Permit
Application for PSEG Salem, N.J. Site
Carneys Point, N.J.
November 4, 2010

My name is Dr. Kenneth Lewis and I too represent the Maryland Conservation Council in support of the PSEG proposal to build a nuclear power facility on the site near Salem, N.J. pending the environmental assessment. We have a unique perspective with regard to environmental concerns relative to large industrial power facilities as we have for since 1972 been a partner within an environmental trust that includes Dominion Energy that manages environmental issues at the 1000 acre Cove Point, MD LNG Facility in Lusby, Md.

As previously stated we believe that nuclear power as a source for clean, reliable, carbon free electrical generation is the best solution to the nation's current and future energy needs and poses the least potential threat to the natural environment when compared with other generation sources such as wind, solar and biomass.

In evaluating environmental issues relative to this nuclear power facility and alternative energy sources that might be proposed to negate its necessity biomass is listed as a consideration. This proposed 2200 Megawatt (MW) nuclear facility sited on 350 acres operating at a slightly conservative capacity factor of 90% will produce 1980 MW. By comparison to grow enough switch grass to fire boilers for electrical generation equal to the output of the nuclear facility (assuming a middle of the range yield of 2.5 metric tons per acre per year would require planting 3700 square miles. The area required in this region makes this solution impractical because it represents about 40% of the area of the state.

Another alternative, solar cell installations on open land, requires large areas and pose a significant threat to the flora and fauna in the geographical regions in which they are proposed. For example, at Nellis Air Force Base in the Nevada desert 1 MW of NAMEPLATE capacity is installed on 9.3 acres of land and these are sophisticated devices that track the sun. In New Jersey where the sun is less intense a 275 square mile installation would be required to equal the electrical output of the proposed reactor.

Solar cells installed on existing structure may not pose any as yet recognized threat to the environment and we support them.

There are two key sections in every EIS: The first is an analysis of the cumulative impacts of the proposed action, and the second is an analysis of alternatives to the proposed action. Thus, the dEIS states: "Cumulative impacts result when the effects of an action are added to or interact with other past, present, and reasonably foreseeable future effects on the same resources." And further: "These combined

impacts...include individually minor but collectively potentially significant actions taking place over a period of time." To many environmental groups renewable energy is a preferable alternative to reactors. To those concerned with the conservation of biological diversity, however, the cumulative ecological impacts of large-scale renewable projects will be their most detrimental effect. We believe that concern for cumulative ecological impacts of the Alternatives, wind, solar, and biomass should be included in the final EIS as a reason for rejecting them as an alternative.

In conclusion we believe that the proposed nuclear power facility is the best option for electrical generation for the region with the least risk for environmental degradation. We have reviewed materials outlining PSEG's previous environmental enhancements and believe that where mitigation and/or remediation is required for any local environmental degradation they have the ability to do so in a way acceptable to environmental overseers.

Thank you,

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