VogtleEISCEmails

From: Adele Kushner
Sent: Tuesday, November 23, 2010 9:59 PM
To: nukewatchsouth@mindspring.com; VogtleCOLAEIS Resource
Subject: EIS: STOP VOGTLE ~ The Answer is Blowing in the Wind

I am submitting these comments to the record on "NUREG 1947: Draft Supplemental Environmental Impact Statement (EIS) for Combined Licenses (COLs) for Vogtle Electric Generating Plant Units 3 and 4" in accordance with the National Environmental Policy Act (NEPA).

For the reasons stated below, the Nuclear Regulatory Commission (NRC) should:
1) Deny Southern Company and its subsidiaries additional limited work authorization (LWA) for further construction related to proposed, unneeded, and still-unlicensed reactors on the Vogtle site in Georgia.
2) Issue a finding of LARGE environmental impacts for the proposed nuclear reactors and the conclusion that off-shore wind is the preferred alternative to nuclear.

LIMITED WORK AUTHORIZATION
Westinghouse's AP1000 reactor design has unresolved safety issues likely to impact the outcome of the licensing review as well as the final cost of the proposed reactors. Containment failure in an accident and analysis of impacts from a direct airline strike are unresolved safety issues of concern even to the NRC license review staff. These factors are likely to affect financing for, and the viability of, the proposed project. Therefore, it is premature to authorize any further work to the Vogtle site.

ENVIRONMENTAL IMPACTS
The draft EIS fails to analyze the continuance of an historic 10-year drought already impacting the Savannah River Basin. The Savannah River is currently the fourth most polluted body of water in the U.S. The two reactors at Vogtle already withdraw over 68 million gallons of water each day, more than the combined daily usage of Atlanta, Savannah and Augusta.

ECONOMIC IMPACTS
Escalating costs for massive reactor projects which will take the better part of a decade to complete strain taxpayer resources in a time of historic recession. The financing of the project with taxpayer, and Georgia ratepayer, funds should be analyzed for socioeconomic impacts. The cost for nuclear reactors must be compared and contrasted with cheaper costs and quicker build-time of shovel-ready wind and solar projects. Recent reports by DOE and Oceana Institute highlight the potential for offshore wind and Georgia is particularly well suited as is Georgia Power which already holds offshore rights from Georgia.

ENVIRONMENTAL JUSTICE
Impacts on the community living directly adjacent to reactors already at the Vogtle site are LARGE. The Shell Bluff community is in the emergency planning zone of the reactors, and yet its residents do not enjoy emergency fire, police and health protection. This under-served community does not have a grocery store, yet could be permanently dislocated following an accidental radiation release from either the existing, or proposed, reactors at Vogtle. This environmental justice issue must be acknowledged and analyzed in the EIS.

DESIGN BASIS ACCIDENT
The draft EIS is based on a reactor design which has not been granted a license. The Westinghouse AP1000 reactor was recently issued a Notice of Violation by NRC review staff for submitting an unrealistic assessment of impacts from a direct airplane strike. The AP1000 also has a basic design defect, in an accident, the so-called "shield building" would funnel radionuclides directly to the environment as shown in the Gundersen report. Either of these issues is sufficient to conclude that the environmental impact from an accident would be LARGE.

COMPARISONS AND ALTERNATIVES

Table 7-1 compares only three energy types: coal, oil and nuclear. The table must be revised to compare also wind, solar, conservation and efficiency. In the likelihood that NRC does not feel qualified to make the assessment on alternative energy, an outside contractor should conduct the study. The study should include the DOE and Oceana reports as well as IEER's Carbon-Free and Nuclear-Free report. As stated above, the cost savings and benefits of readily available alternatives must be contrasted wtih long-range, high-risk speculation on new reactor build. Georgia's excellent potential for offshore wind must be incorporated into the EIS.

Rather than continue with this flawed and dangerous model, which puts at immediate risk the community which lives close to the existing reactors, the only responsible action is to study and evaluate alternatives in the studies by NC WARN, Arjun Makhijani, SACE, DOE, and OCEANA. Otherwise we would be repeating the wasteful and dangerous use of valuable resourcs particularly people's lives which were spent in building the first two reactors.

Thank you for considering these points in the Vogtle Environmental Impact Statement. Please notify me of final EIS publication.

References:
Post Accident AP1000 Containment Leakage, FaireWinds Associates, April 2010; The Water-Energy Connection: Georgia Facts & Figures, SACE, 2008; Untapped Wealth: Offshore Wind Can Deliver Cleaner, More Affordable Energy and More Jobs than Offshore Oil, Oceana, 2010; Creating an Offshore Wind Industry in the U.S.: A Strategic Work Plan for DOE, 2010; Carbon-Free and Nuclear-Free: A Roadmap for U.S. Energy Policy, IEER, 2007; Solar and Nuclear Costs â€" the Historic Crossover, NC WARN, 2010; Health Risks of Adding New Reactors to the Vogtle Nuclear Plant, PHRP, 2007

Respectfully submitted,

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Federal Register Notice: 74FR49407
Comment Number: 12

Mail Envelope Properties (E1PL5ZJ-0006Pu-Mk)

Subject: EIS: STOP VOGTLE ~ The Answer is Blowing in the Wind
Sent Date: 11/23/2010 9:58:49 PM
Received Date: 11/23/2010 9:59:04 PM
From: Adele Kushner

Created By:

Recipients:
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Files	**Size**	**Date & Time**
MESSAGE	5476	11/23/2010 9:59:04 PM

Options
Priority: Standard
Return Notification: No
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