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Mail Stop: TWB-05B01M
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

10/28/10
75 FR 66398

By FAX RADB 301-492-3446

**RE: Docket Nos. 50-272, 50-311 and 50-354; NRC-2009-0390 and NRC 2009-0391
Nuclear Regulatory Commission Generic Environmental Impact Statement for License
Renewal Regarding Hope Creek Generating Station and Salem Nuclear Generating Station,
Units 1 and 2**

Ladies and Gentlemen:

Thank you for the opportunity to comment on the Nuclear Regulatory Commission Generic Environmental Impact Statement for License Renewal Regarding Hope Creek Generating Station and Salem Nuclear Generating Station, Units 1 and 2 in Salem County. The New Jersey Energy Coalition submits these comments in connection with the above mentioned dockets.

As background, the New Jersey Energy Coalition is a broad-based advocacy group whose membership includes businesses, industry, labor leaders, civic organizations and distinguished citizens from across New Jersey. The Coalition's focus is to provide a credible third-party voice in the discussion on the composition of New Jersey's energy portfolio. We provide education that stresses the need for a broad energy platform that includes conservation, green job creation, energy efficiency, supply diversity, transmission upgrades, clean base load generation and healthy, smart and economically viable renewable energy projects.

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Add: L. Perkins (LTP1)



Since it was formed in August 2007, the New Jersey Energy Coalition has been actively involved in New Jersey's energy sector at all levels, through a variety of events, forums and approaches. Our goal is to inform and educate citizens, businesses and policy makers on the need for a strong, focused, diverse set of solutions to meet our state's present and future energy needs.

The New Jersey Energy Coalition's primary focus is on our state's environmental and economic well being. The Coalition's mission is to support clean, affordable, reliable sources of energy, and no form of base load generation fits that description better than nuclear energy. Based on data compiled annually by the Nuclear Energy Institute, New Jersey's four nuclear reactors produced 55 percent of our in-state electrical supply in 2009. The New Jersey Energy Coalition strongly feels that the development of new nuclear plants can help our state address climate change issues and fuel economic stimulus.

In its findings the Nuclear Regulatory commission (NRC) Staff evaluated the environmental impacts from license renewal over a wide variety of impacts areas including air quality, groundwater, surface water, aquatic and terrestrial resources, human health, socioeconomics and waste management and concluded that relicensing offered the least environmental impact over several alternatives including supercritical coal-fired generation, gas-fired generation, a combination alternative (gas-fired, renewables and energy conservation and efficiency) and a no-action alternative.

We support those findings. Nuclear generation is clean. It produces zero carbon emissions or criteria air pollutants. In 2009 alone, New Jersey's nuclear power plants avoided the emission of one hundred and forty-two thousand tons of sulfur dioxide and 30 million metric tons of carbon dioxide, emissions that commonly contribute to greenhouse gases, smog and acid rain. Nuclear energy accounts for 73 percent of the nation's emission-free electrical generation, and it needs to expand this role in compliment with other renewable sources to meet rising energy demand in an environmentally responsible matter. Alternative sources are important, but can only take us so far — wind and solar are intermittent and lack the sheer capacity of base load plants.

Conservation efforts, energy efficiency enhancements and a diverse mix of energy sources will serve us best. However, the continued operation of our existing nuclear power plants is an equally important, environmentally clean and reliable solution. The relicensure of these generating facilities is essential if we are going to address climate change, meet demand increases in a meaningful way, and promote energy independence from the Middle East. Changes in federal air regulations, the age of existing facilities and an improving economy all signal the continued need for clean base load power supplies.



Nuclear energy is also affordable and reliable. With rising energy costs a concern for every American, nuclear power plants are the lowest-cost producer of base load electricity. Especially in a region that is densely populated and whose industry drives demand, nuclear generation's low cost and reliability fosters a competitive energy market and keeps electric costs down for the ratepayer.

And in these difficult economic times, the approximately 1,600 full time jobs at these facilities are critical to the state's economy. Every year nuclear plants generate approximately \$430 million in the sales of goods and services in their local communities, not to mention their significant tax contributions that benefit local infrastructure, public services and schools.

We need to keep pace with our state's energy needs. The U.S. Department of Energy projects that national electricity demand will increase 28 percent by 2035, and to maintain nuclear energy's current 20 percent contribution, we must build about one new reactor per year starting in 2016. New wind and solar power will definitely play a part in our energy future, but the simple nature of their intermittency requires something more. The New Jersey Energy Coalition also supports the development of a new nuclear facility in Salem County as it will help mitigate rising energy demand with a clean power source that fuels job growth and strengthens our economy. As noted in the NRC report, generation merchants in PJM have retired a large number of generation sources since 2003, with a total of 5,945 MW retired and 2,629 MW pending retirement.

In conclusion, given the challenges that our state faces in terms of environmental and economic well being, relicensing of the plants and maintaining 3,656 megawatts of clean, reliable generating capacity is the right decision. We support the NRC Staff's preliminary findings and support the relicensing of Salem Units 1 and 2 and Hope Creek.

Very truly yours,

Robert K. Marshall, Executive Director
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Pages: 4
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