

# FAX

TO: Chief, Rules and Directive Branch, RDB	FROM: Susan Michetti
COMPANY: U.S. NRC	COMPANY:
FAX: 3014923446	FAX:
SUBJECT: Proposed 17% EPU at Point Beach WI Reactors	DATE: Friday, January 07, 2011

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6 January 2011

Chief, Rules and Directive Branch, RDB  
TWB-05-B01M  
Division of Administrative Services  
Office of Administration  
U.S. NRC  
Washington, DC 20555-0001

RE: Dec. 10, 2010, Vol. 75, No. 237, page 77010-77017, and Docket Nos. 50-266 and 50-301; NRC-2010-0380.

To Whom It May Concern re the proposed 17% EPU at Point Beach WI Reactors:

The NRC's draft Environmental Assessment is dead wrong about no significant impact resulting from a 17% "extended power uprate (EPU)" at the Point Beach WI reactors. This is sleight of hand from playing with process in ways that are less than open and honest. I ask that the NRC's draft EA go back and incorporate all the comments of concerns from the recent relicensing process appearance, including my own and those of others, which were dismissed on technical grounds, meaning that they apparently were concerns that were not required to be examined during the relicensing process. Concerns about dilapidation of a nuclear reactor involving tritium leakage into ground water and into other drinking water sources as well as other important safety issues were dismissed without serious examination during the relicensing process. I ask where in the process do these concerns get addressed seriously, if not in relicensing and if not in upping the power of dilapidated leaky parts that are not adequately addressed in a serious way for public safety? These serious concerns should not be able to dismissed again now when the owners desire to up the power and to up the serious radioactive leakage. **NRC HAS NOT ADEQUATELY ADDRESSED THE TRITIUM LEAK AS WELL AS OTHER KNOWN ISSUES.** This NRC process has become untrustworthy and needs to be examined by authorities above the NRC as inadequate to protect public safety.

The lack of public safety protection is a serious issue. The NRC's draft does not state explicitly any effects on aquatic communities in Lake Michigan of the proposed EPU, including known tritium leakage already existing. It does not state explicitly any effects on the workers at the plant of the proposed EPU. The draft uses wording such as "not expected, negligible, not significant, and adequate." These words inspire little confidence that this planned increase is an innocuous choice given Point Beach's previous safety violations. I expect more specific assurances without a world full of slide room when the problems develop and endanger public safety.

The Federal Register notification for this proposal (< <http://edocket.access.gpo>

[gov/2010/2010-31085.htm](http://gov/2010/2010-31085.htm) >) admits that approval would cause a 17 percent increase in the radioactivity in the gaseous and liquid waste produced by the reactors (p. 77014). But surprisingly, the Environmental Assessment (EA) asserts that no improvements in current reactor or waste treatment machinery will be necessitated by the Extended Power Uprate (EPU) (p. 77015), and I view this as illogical minimizing of issues.

The notice states:

**"Offsite Doses at EPU Conditions**

"The primary sources of offsite dose to members of the public from the PBNP are radioactive gaseous and liquid effluents. As discussed above, operation at the proposed EPU conditions will not change the radioactive gaseous and liquid waste management systems' abilities to perform their intended functions. Also, there would be no change to the radiation monitoring system and procedures used to control the release of radioactive effluents in accordance with NRC radiation protection standards in 10 CFR Part 20 and Appendix I to 10 CFR Part 50.

"Based on the above, the offsite radiation dose to members of the public would continue to be within regulatory limits and therefore, would not be significant."

This false assertion comes out of fantasy-land. It does not incorporate rational scientific thinking, which would be expected, but apparently those preparing these reports lack adequate scientific understanding of radioactivity and public safety. This is too preposterous to be taken seriously. Any and all exposure to ionizing radiation, internal or external, increases one's chances of cancer, birth defects, immune system dysfunction and other illnesses. Radioactivity is the most toxic chemical on earth.

Since the operators of this reactor complex have already been convicted of and fined \$60,000 for providing false information to federal regulators in 2005, absolutely nothing claimed by the licensee in Federal Register notification and the the EA should be accepted as fact without complete supporting documentation that does not have significant omissions. The facts must be scrutinized with the utmost skepticism expected of the scientific process.

The two reactors involved are 40 years old and delapidated. They have a record of poor operations and accidents, including unsolved tritium leakage into groundwater with an increasing plume when the tritium leakage **HAS NOT BE SOLVED AND STOPPED AS EXPECTED TO MEET PUBLIC SAFETY REQUIREMENTS**. The owners have been convicted of harassing whistleblowers and of lying to government regulators, and this indicates that their reliability and trustworthiness is questionable at best. They cannot be expected to operate safely even at low power.

The proposed power uprate should be absolutely denied.

Sincerely,

Susan Michetti

605 Sheila St.

Mt Horeb WI 53572