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Re-licensing of South Texas Project Units 1 & 2

**Additional SEED Coalition Comments Regarding Re-licensing of South Texas Project Reactors 1 & 2**

There are many issues of concern regarding re-licensing of STP Reactors 1 & 2. We oppose re-licensing and believe the reactors should be shut down by their original retirement dates – in 2027 and 2028, or sooner and that adding 20 more years of operation could lead to unsafe conditions.

At least one of the troubled Fukushima reactors in Japan had just been re-licensed, and the situation would likely have been less severe if this reactor had been decommissioned.

SEED Coalition has previously submitted comments as intervenors and provided oral comments at a public hearing. We would like to again raise concerns about the risks of an accident, fires, or explosions at one or more reactors at the site, risks that could increase with aging reactors.

We are all too aware of the fact that meltdowns can and do happen, and a recent Union of Concerned Scientists report notes that there were 14 near misses in the U.S. in 2010. NRC's 1982 CRAC 2 study found that there could be 18,000 early deaths if a serious accident occurred at the ST(N)P site, followed by thousands of cancers.

Safer, cleaner alternative ways to generate the same power exist today and should be used. We should not be subjected to worrying about radioactive contamination – just to generate electricity. We should not have to worry about terrorists attacking a radioactive energy generation source, and we don't have these worries with solar, geothermal, natural

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gas or wind power. These forms of energy generation, combined with energy efficiency and ever improving methods of storage, could easily replace the electricity generated by Units 1 & 2. When these units have been down due to problems or fuel replacement, it did not cause problems with the grid or lead to blackouts. We can replace the generation of these units with safer, cleaner technologies.

These reactors consume vast quantities of water use, largely Colorado River water, which is increasingly needed for drinking water, livestock and farming. Drought is expected to increase in our region. We are concerned that there will not be adequate water to cool the reactors in an emergency, or that the water will not be cool enough to effectively cool the reactors. Some U.S. reactors have had to shut down due to high water temperatures, and this could scenario could worsen with climate change impacts, leaving us with a dangerous situation and a shortage of power during intense heat waves.

The main cooling reservoir is leaking out the bottom, as documented in the license application for STP 3 & 4. The reactors should not be re-licensed when this serious condition remains unresolved. How and when will this be repaired? What studies have been done by the NRC on this serious problem? How can re-licensing even be considered until this situation is corrected? Where is the water going, and how extensive is the radioactivity that may be leaking into the Gulf of Mexico and/or Colorado River?

It is time to stop generating more radioactive waste since there is no safe storage and disposal solution, even after attempts have been made for some sixty years. Re-licensing would the creation of waste. There may not be enough room for even the so-called "low-level" radioactive waste at the planned West Texas radioactive waste dump, since there is an attempt to allow Out of Compact waste and the volume and curies limits may be reached long before all STP waste could be shipped. There is still no "high-level" repository for spent fuel rods.

We are concerned about increasing tritium levels in wells on site and in the Colorado River. Extensive testing should occur for all organisms in the region, and exposure of whooping cranes to tritium and other radionuclides should be examined since they are an endangered species and their winter grounds are only 35 miles from the STP site.