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# PUBLIC SUBMISSION

**Docket:** NRC-2010-0375  
Notice of Receipt and Availability of Application for Renewal of Facility Operating License

**Comment On:** NRC-2010-0375-0003  
STP Nuclear Operating Company; Notice of Intent to Prepare an Environmental Impact Statement and Conduct the Scoping Process for South Texas Project, Units 1 and 2

**Document:** NRC-2010-0375-DRAFT-0013  
Comment on FR Doc # 2011-01904

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RULES AND REGULATIONS

## General Comment

The license renewal application is inadequate because it:

- Fails to adequately address the Applicant's capacity to deal with fires and explosions that cause a loss of large areas of the plant. The mitigative strategies for addressing fires and explosions are inadequate to address the consequences of events such as the impacts of large commercial aircraft crashing into the reactors or related facilities.
- Fails to describe the means that would be used to determine radiation exposures to fire and explosion responders.
- Fails to describe the means that would be used to protect fire and explosion responders from excessive radiation exposures.
- Fails to determine the projected decline in demand for electricity attributable to adoption of energy efficient building code in Texas. According to a study by the American Council for an Energy Efficient Economy, building codes that increase energy efficiency may result in an energy saving of approximately 2362 MW by 2023. Such savings would nearly offset the net electrical output of 2500 MW from STP Units 1 & 2.

The applicant for license renewal is STPNOC - the South Texas Nuclear Operating Company. The Matagorda County nuclear reactors are owned by NRG South Texas LP, CPS Energy and the City of Austin (of which I am a resident). Austin gets 16% of its power from the two units.

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