

9/11/2011

76 FR 54502

(62)

As of: November 17, 2011
Received: November 16, 2011
Status: Pending_Post
Tracking No. 80f6e0d6
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: NRC-2010-0029

Notice of Receipt and Availability of Application for Renewal of Columbia Generating Station Facility Operating License

Comment On: NRC-2010-0029-0015

Energy Northwest, Columbia Generating Station; Notice of Availability of Draft Supplement 47 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants and Public Meetings for the License Renewal of Columbia Generating Station

Document: NRC-2010-0029-DRAFT-0079

Comment on FR Doc # 2011-22415

Submitter Information

Name: Theodora Tsongas

Address: United States,

General Comment

I do not support the renewal of the Columbia Generating Station's license when it expires in 2023, for the reasons described in the attached file which provides details of my comments on the draft environmental impact statement :

Attachments

Comments on the Columbia Generating Station License Renewal EIS

RECEIVED
 NOV 17 AM 10:19
 RULES / EIS / ACTIVITIES

SUNSI Review Complete

Template = ADM-013

E-RIDJ = ADM-03

Add: D. Doyle (DID)

S. Freeman (S2FI)

Comments on the Columbia Generating Station License Renewal EIS

Theodora Tsongas, PhD, MS November 2011

I do not support the renewal of the Columbia Generating Station's (CGS) License when it expires in 2023, for the following reasons:

The CGS is not needed to meet future power generation needs: we can use our scarce resources to develop and use alternative sources that are safer, less expensive, and sustainable.

Generating nuclear power at the Columbia Generating Station is too dangerous to even permit the current license to continue in force. Apparently the safety review by the NRC was inadequate, giving little consideration to the long term and short term safety and health issues that are foremost in the concerns of the public who are and will be impacted by this facility.

We must act wisely and learn everything we can from the Fukushima disaster as it continues to unfold. Renewing the CGS license without thorough consideration of the valuable information being generated as a result of the Fukushima Daiichi disaster would be flying in the face of reason and rigorous science.

Any use of plutonium is unwarranted. We simply cannot afford the risks of irreversible harm to our health and the ecosystem that supports life on this planet. The EIS ignores the proposed plan to use plutonium fuel, the same fuel as Fukushima reactor 3 with grave risks and extensive radiation releases. The risks must be disclosed in the EIS. A technical analysis by Energy NW has pointed out that if a full load of plutonium fuel had been used in Reactor 3, the offsite radiation doses, already too high, would have been much higher. We cannot afford to take these risks in light of current knowledge.

The potential for a catastrophic incident, such as the overdue subduction zone earthquake in the Pacific Northwest, and its consequences, have not been considered in this Environmental Impact Statement, nor has seismic activity in the RGS region been adequately considered including current data connecting the Yakima fold and thrust belt to active faults in the Puget lowland.

Site-specific environmental impacts cannot be evaluated in isolation from the location of CGS in close proximity to the Hanford facility. The cumulative impact of these two joint facilities in an incident has not been considered in this EIS. Consideration of the dangerous location of the reactor on the Hanford Nuclear Reservation has not been adequately dealt with in the EIS. The EIS must consider the impacts if there is an explosion, fire, and or, earthquake with radiation and hazardous materials releases that could prevent operation or recovery of the CGS reactor. Hanford's high level waste tanks and highly contaminated buildings, including the building that ENW proposes to use for Plutonium fuel are not build to withstand the potential earthquakes. These risks must be described and evaluated in the EIS.

All safety considerations and analysis of back-up systems should be an integral part of this review. According to National Environmental Policy Act, all potential significant impacts need to be presented in one document to the public.

All alternative sources of energy need to be compared in terms of severe accident potential. This is a necessary addition to the EIS and this accident potential has not been used in the comparison, thus biasing the comparison in favor of more costly and riskier forms of energy.

NRC must consider stopping all license renewals and construction until a waste site has been found. Spent fuel and waste issues need to be considered for their interactions in catastrophic incidents. Continued operation with no place to safely store the waste is unconscionable!

The Generic EIS is 15 years old. It is not acceptable to use it in light of current science. An appropriate EIS needs to look more specifically at each local situation. The potential for adverse health impacts at Hanford have not been adequately evaluated. Furthermore, in terms of inadequate transparency, this draft generic EIS is characterized by over-verbose reiterations of boiler-plate definitions but does not provide necessary detail on data and analyses used as the basis for conclusions drawn. The conclusions drawn on the safety of the Columbia Generating Station appear to be arbitrary and not supported by the evidence provided in the draft Generic Environmental Impact Statement.

How can an environmental impact statement be considered complete without a thorough review of the safety of this facility. Why is the safety evaluation not part of this EIS? Why is consideration of the NRC's examination of the Fukushima disaster and the impact of such a disaster on the spent fuel pools not considered in this examination of the CGS? Why is it not part of the license renewal process? If it is part of another process, why is that not transparent and referenced in this document? Why is there no opportunity for public comments on reactor safeguards? These are our tax dollars that you are spending, without our permission! [Wallstreet won't take the financial risks; why should we?]