

## Fermi3CEm Resource

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**From:** Kay Cumbow [kcumbow@greatlakes.net]  
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### **Citizens for Alternatives to Chemical Contamination**

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#### **Docket ID NRC-2008-0566**

Draft Environmental Impact  
Statement for Combined License (COL)  
for Enrico Fermi Unit 3  
report number: NUREG-2105

To the Nuclear Regulatory Commission:

Citizens for Alternatives to Chemical Contamination (CACC) is a 501 C3 grassroots environmental education and advocacy organization, founded in 1978 and dedicated to the principles of social and environmental justice and protection of the Great Lakes Ecosystem. CACC is an intervener before the ASLB on the proposed Fermi 3 reactor.

CACC contends that the public comment period for the Fermi 3 Draft Environmental Impact Statement should be extended, by at least 60 days after the Biological Report, *(essential to understanding and review of the draft EIS)* is completed, released to the public and the public has adequate time to review. This is a draft *Environmental* Impact Statement and *there is no way that the public can adequately assess this whole DEIS* and the possible harm or ramifications to the environment, whether it be the health of the human community or ecosystem, upon which humans utterly depend, without access to the Biological Report. It is an unacceptable segmentation of the DEIS. The Biological Report is a fundamental part of any EIS.

Protection of people and the environment is written right into the NRC's Mission statement, and should be your top priority, not a decision to short-change the public from critical information, in order to keep to a schedule, especially when what is being constructed is a new, untried reactor, admittedly lacking many of the critical safety systems required of other commercial reactors, (because it is heralded as "inherently safer" - even though the safety of this reactor has never been proven over time.) Merely one severe nuclear reactor accident can damage very large areas of land and water for centuries, and cause enormous damage to the health of communities and the ecosystem for generations. We protest and oppose the idea that either humans or the Great Lakes watershed should be guinea pigs for the nuclear industry. The precautionary principle states that: "When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context, the proponent of an activity, [in this case, the utility] rather than the public, should bear the burden of proof. ***The process of applying the Precautionary Principle must be open, informed [emphasis mine] and democratic and must include potentially affected parties.*** It must also involve an examination of the full range of alternatives, including no action." Separating this vital report from the whole of the DEIS, is designed to keep the public in the dark, and without full information or participation. Ivan Selin, former Chair of the NRC, once said that the public would have no confidence in a process they could not participate in.

Now - *to assuage an industry shaken by the meltdowns and radioactive releases at Fukushima, a serious earthquake affecting nuclear plants in the northeast, cracking of the shield building at Davis-Besse, the recent loss of over half of the control room functions at Palisades, and many other unresolved management and safety issues uncovered both in the U.S. and global nuclear industry – as well as increased electrical efficiency, greater conservation by a financially and environmentally aware public, and greater competition from cleaner, safer renewable energy such as wind and solar, which do not bring the costly environmental burden of uranium mining, milling and processing, nor the unwanted lethal burden of irradiated fuel that must somehow be isolated from the biosphere for a million years or more - (all of which is bringing huge economic repercussions and a loss of public confidence)* - the Nuclear Regulatory Commission wants to cut corners in the National Environmental Protection Act, so as to hurriedly build another reactor before the public has a chance to look too closely. This reactor has yet to have final approval by the U.S. NRC, yet the NRC is denying the public access to vital information about possible repercussions to the environment. A biological report is a key component of any NEPA process. The health and safety of the public or the environment appears to mean little to either the NRC or the nuclear industry.

CACC contends that the biological report is part and parcel of the environmental impact statement and the draft EIS cannot be adequately reviewed apart from that report.

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