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NRC Public Meeting to Discuss the Draft Environmental Impact Statement for the Combined Licenses Application for the William States Lee III Nuclear Station, Units 1 and 2 ~ Docket Nos. 52-018 and 52-019

January 19, 2012 ~ Gaffney, SC

I'm Katie Hicks, the Assistant Director of Clean Water for North Carolina, a nonprofit organization working with communities for clean water and environmental justice.

We are opposed to the construction of all new nuclear reactors for many reasons, including massive water use and generation of toxic radioactive waste and increased demand for fuel where mining has a massive record of health impacts on poor and indigenous communities. Today I'll focus on three aspects of the Environmental Impact Statement for the proposed reactors: Make-Up Pond C, impacts to the Broad River, and environmental justice considerations.

The DEIS does not adequately show that Make-up Pond C's capacity will suffice to maintain plant operation and protect water quality and flow in all possible drought scenarios, so we believe its negative impacts outweigh its benefits. Pond C's creation would displace residents of up to 86 homes and mobile homes, mostly low-income folks. The average per capita income of residents who would be displaced is \$0-\$16,000. The pond's creation would also result in complete loss of rare and valuable Piedmont riparian habitat along London Creek.

Some simple calculations based on the DEIS indicate that, if withdrawals from Pond C are made necessary by drought, the pond's supply would only last about 90 days, or 3 months. Climate science predicts that many parts of the world will experience longer and deeper droughts than ever in the coming years. Duke Energy's drought contingency plans are insufficient considering both the high level of uncertainty regarding the length of future droughts in the Broad River Basin and the risks associated with unexpected shutdown of nuclear reactors.

The proposed reactors' water withdrawals and degradation of the Broad River would place further strain on an already strained river basin. In addition to the 47 million gallons of water per day the plant would withdraw, with 75% of this lost through evaporation, we've calculated that the Broad would lose roughly 5 1/2 billion gallons of water each year due to forced evaporation of heated water downstream of the plant. Discharges of hot water, heavy metals and trace radiation place stress on the aquatic community. Massive withdrawals and toxic discharges are also a potential threat to drinking water supplies downstream. The City of Union's drinking water intake is just 21 miles downstream from the proposed discharge.

Finally, the EIS does not adequately address the range of environmental injustices this plant would create. The environmental justice assessment included in the EIS only looks at demographics in the surrounding 50 mile radius as a whole, failing to include any pockets of low-income or minority residents who could be selectively and disproportionately impacted by the facility. For example, the residents displaced by Pond C would be mostly low- to mid-income, meaning relocating could be even more difficult for them. The residents of Union, whose water supply could be threatened by withdrawals and discharges to the Broad, were almost 50% minorities as of the 2000 census, and 20% of the population was below the poverty line. Those are just a few examples of the many direct and indirect ways in which this plant could severely impact vulnerable communities and populations.

In conclusion, Clean Water for NC opposes the construction of the William States Lee nuclear station. We support the Energy Conservation alternative in section 9.2.1.3 of the DEIS. Despite the NRC's claim that this method is not a reasonable alternative, our extensive research has shown that demand reduction through energy efficiency programs is the most cost-effective and job-creating strategy for meeting our energy needs. Thank you!