

To: Lee.COLAEIS@nrc.gov (NRC)
From: Ellen Thomas <et@prop1.org>
Subject: Final comments on NUREG-2111, Lee Nuclear Stations 1 and 2, by Ruth Thomas and Ellen Thomas
Cc:
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Attached:

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76 FR 79228*

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HILLTOP COMMUNICATIONS

To: Chief, Rulemaking and Directives Branch - Lee.COLAEIS@nrc.gov
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: NUREG-2111, Comments on your Draft Environmental Impact Statement (EIS) for Combined Licenses (COLs) for William States Lee III Nuclear Station Units 1 and 2

Researchers with Environmentalists, Inc. and Women's International League for Peace and Freedom have continued our review of the Environmental Impact Statement (EIS) for the Lee Nuclear Station Units 1 and 2, including the collaboration between the NRC and the US Army Corps of Engineers.

Please add the following comments to Ruth Thomas's presentation at the January 19, 2012 Public Meeting in Gaffney, SC:

The following problems are among those we have identified:

- 1) The problem of continuously needing excessive amounts of water to cool the nuclear reactors' extremely high temperatures, to avoid a partial or complete meltdown, or explosions, or release of highly radioactive gases, particulates, and liquids. During droughts, the shallow Broad River may not have enough water to both serve the nuclear power plant and the community that relies on this water both upstream and downstream.
- 2) The problem of financing nuclear reactors and the expensive equipment and backup systems to limit the dangers of both routine and accidental releases of radioactivity into the air, the soil, and the water.
- 3) The problems associated with earthquakes, tornadoes, floods, fires, hurricanes, all weather conditions which contribute to disturbing cooling water use.
- 4) The problems of human error and misconduct of workers.
- 5) The problem of the proposed nuclear power plant requiring the destruction of a sizeable area of woodlands and natural resources: The need to re-dredge reservoirs for backup cooling water such as Ponds A and B, plus newly digging 640-acre Pond C .
- 6) The disruption of bird migrations, as mentioned in the EIS.

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- 7) The problem of building and maintaining a repository which provides absolute containment for the length of time it takes for radioactive materials to decay to a safe level. For example, Plutonium-239 has a half-life of **24,000 years**.
- 8) The problem of highly radioactive spent nuclear fuel having to be stored onsite because there is no safe repository
- 9) The problem of providing containment during transport of radioactive materials. For example, an accident on I-85 would result in the total disruption of access from Atlanta to Greenville/Spartanburg to Charlotte. If there were an accident, all tourism and jobs in the surrounding area would cease, and everyone that lives in close proximity would have to have their food and basic necessities imported, or else leave.
- 10) The problem that one of the subsidies, the Price-Anderson Act, could in no way recompense victims of a nuclear accident. The many of billions it would cost for evacuation and relocation of families, businesses, hospitals, and schools, and for cleanup (if possible), would come once again from the taxpayers.
- 11) Fukushima proves that assigning 10-mile or 50-mile evacuation zones is totally inadequate, as no one can predict how far or in what direction a plume might travel.
- 12) The cost of new equipment and additional risk-reduction measures which Fukushima made us aware that we need.
- 13) The financial drain to taxpayers and rate-payers of subsidies to the nuclear industry for 50-plus years has interfered and continues to interfere with funding for solar, wind, tidal, geothermal and other suppliers of clean energy, and for conservation measures such as retrofitting, all of which would provide many more jobs for much longer than nuclear.
- 14) The problem of needing a new oversight agency which is not comprised of members of the nuclear industry or other vested interests.
- 15) The problem of the expense of protecting against terrorism.
- 16) The problem of operating a nuclear station means continually being prepared for a nuclear accident, including identifying evacuations centers, keeping residents over a large area informed and trained for a nuclear emergency.
- 17) There are numerous people, families, representatives of organizations in the Gaffney area who have not received the Environmental Impact Statement or other notices or reports, nor have they been informed that there are expected to be "acceptable" releases into the air, water or soil during the nuclear plant's normal operations. For example, Duke Energy admits that 2.1 million gallons of low-level radioactive waste-water per year can be expected to go into the Broad River, and claims that this is safe for those downstream. It's thought by both Duke and the NRC that this figure might be 50% low, which means it could be 4.2 million gallons.
- 20) The problem that Duke Energy proceeds with pre-construction activities such as clearing land, cutting trees, evicting residents, digging ponds, while the plant is still only under consideration. These activities should stop.

- 21) The problem that Duke Power wants to charge rate-payers for these pre-construction activities without any guarantee that its customers will ever receive electricity from the proposed plant. For example, the Cherokee plant was never finished at this same site, after many millions of dollars had been spent.
- 22) The problem of escalating costs of building the proposed Lee Station as well as increased costs for transportation, storage, and disposal.
- 23) The problem that the proposed AP1000 nuclear reactor is a new, untested design.
- 24) The false claim that nuclear power has no carbon footprint, which ignores the huge carbon footprint involved in the entire nuclear chain: mining and processing the uranium, building the nuclear facilities, transporting fuel rods to and radioactive waste from nuclear power plants, etc.
- 25) The problem that those most vulnerable to radioactive releases from nuclear plants are children, women, and the elderly. Radiation exposure causes cancer years down the road, but it also more immediately causes miscarriages and birth defects.
- 26) The problem that so long as there are nuclear power plants anywhere, nuclear weapons are possible.

Considering all these problems, we adamantly oppose the licensing or building of the Lee Nuclear Stations 1 and 2, or any other nuclear power plants, anywhere.

Sincerely,

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and

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