

**Environmental Impact Statement  
Scoping Process**

**Summary Report**

**South Texas Project, Units 1 and 2**

**2012**



**U.S. Nuclear Regulatory Commission  
Rockville, Maryland**



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## A. Introduction

The U.S. Nuclear Regulatory Commission (NRC) received an application from STP Nuclear Operating Company (STPNOC), dated October 26, 2010, for renewal of the operating licenses for South Texas Project (STP), Units 1 and 2. STP is located in Bay City, TX. The purpose of this report is to provide a concise summary of the determinations and conclusions reached, including the significant issues identified, as a result of the scoping process in the NRC's environmental review of this license renewal application.

As part of the application, STPNOC submitted an environmental report (ER) (STPNOC 2010) prepared in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51, which contains the NRC requirements for implementing the National Environmental Policy Act of 1969 (NEPA). The requirements for preparation and submittal of ERs to the NRC are outlined in 10 CFR 51.53(c)(3).

The requirements in 10 CFR 51.53(c)(3) were based upon the findings documented in NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (GEIS) (NRC 1996, 1999). In the GEIS, the staff identified and evaluated the environmental impacts associated with license renewal. After issuing a draft version of the GEIS, the staff received and considered input from Federal and State agencies, public organizations, and private citizens before developing the final document. As a result of the assessments in the GEIS, a number of impacts were determined to be generic to all nuclear power plants (or, in some cases, to plants having specific characteristics such as a particular type of cooling system). These generic issues were designated as "Category 1" impacts. An applicant for license renewal may adopt the conclusions contained in the GEIS for Category 1 impacts unless there is new and significant information that may cause the conclusions to differ from those of the GEIS. Other impacts that require a site-specific review were designated as "Category 2" impacts and are required to be evaluated in the applicant's ER.

On January 31, 2011, the NRC initiated the scoping process for the STP environmental review by issuing a Federal Register notice (76 FR 5410). This notified the public of the staff's intent to prepare a plant-specific supplement to the GEIS regarding the application for renewal of the STP, Units 1 and 2, operating licenses. The plant-specific supplement to the GEIS is referred to as the Supplemental Environmental Impact Statement or SEIS. The SEIS will be prepared in accordance with 10 CFR Part 51.

The scoping process provides an opportunity for public participation to identify issues to be addressed in the SEIS and to consider public concerns and issues. The notice of intent identified the following objectives of the scoping process:

- Define the proposed action
- Determine the scope of the SEIS and identify significant issues to be analyzed in depth
- Identify and eliminate peripheral issues
- Identify any environmental assessments and other environmental impact statements being prepared that are related to the SEIS
- Identify other environmental review and consultation requirements
- Indicate the schedule for preparation of the SEIS
- Identify any cooperating agencies
- Describe how the SEIS will be prepared

The NRC's proposed action is whether to renew the STP, Units 1 and 2, operating licenses for an additional 20 years.

The scope of the SEIS includes an evaluation of the environmental impacts of STP license renewal and reasonable alternatives to license renewal. The 'Scoping Comments and Responses' section of this report includes specific issues identified by the comments. The subsequent NRC responses explain if the issues will be addressed in the SEIS and, if so, where in the report they will likely be addressed. At the onset of the project, the NRC identified several significant issues, which are site specific and defined as applicable Category 2 issues, for this license renewal review. The significant issues that were identified in the scoping process are water usage and potential groundwater impacts related to tritium releases.

Throughout the scoping process, the NRC staff identified and eliminated peripheral issues. This report provides responses to comments that were considered to be peripheral and will be evaluated no further. Those that were considered to be in scope will be evaluated in detail and documented in the appropriate sections of the SEIS for STP, Units 1 and 2, license renewal.

Another environmental impact statement has been prepared by the staff for the STP, Units 3 and 4, proposed new reactors and was published in February 2011 (NRC 2011a, 2011b). The EIS for the proposed new reactors contains a bounding cumulative impact analysis for STP, Units 1, 2, 3, and 4. The staff stated in the EIS: "The review team considered, among other things, cumulative effects of the proposed Units 3 and 4 with current operations at existing STP Units 1 and 2."

The NRC staff is required to consult with the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (FWS) under the Magnuson-Stevens Fisheries Conservation and Management Act and Section 7 of the Endangered Species Act in order to evaluate the potential impacts of continued operation on the affected endangered species. The staff is consulting with these agencies during this review.

The NRC staff plans to coordinate compliance with Section 106 of the National Historic Preservation Act (NHPA) in meeting the requirements of NEPA. Pursuant to 36 CFR 800.8(c), the NRC intends to use its process and documentation for the preparation of the SEIS for the proposed action to comply with Section 106 of the NHPA in lieu of the procedures set forth at 36 CFR 800.3 through 800.6. In order to fulfill its obligations, the NRC initiated consultation with the Advisory Council on Historic Preservation, the Texas State Historic Preservation Officer, and Indian tribes who were considered to have historical ties to the vicinity of STP. The following tribes are being consulted:

- Ysleta del Sur Pueblo
- Kiowa Tribe of Oklahoma
- Tonkawa Tribe of Oklahoma
- Lipan Apache Tribe of Texas
- Tap Pilam-Coahuiltecan Nation
- Pamaque Clan of Coahuila Y Tejas
- Alabama-Coushatta Tribe
- Comanche Nation
- Apalachicola Creek
- Lipan Apache Band of Texas
- Kickapoo Traditional Council
- Apalachicola Band of Creek Indians

The staff lists the consultation with agencies and Indian tribes in Appendix D and Appendix A of the SEIS as appropriate. The Agencywide Documents Access and Management System (ADAMS) accession number for each consultation correspondence received during the scoping

period is listed in Table 2 of this report. The staff did not identify any cooperating agencies for the STP license renewal review and expects to publish the draft SEIS in November 2012.

The staff will prepare the SEIS with contract support from Pacific Northwest National Laboratory (PNNL) in the areas of cultural resources, hydrology, and severe accident mitigation alternatives (SAMA).

The NRC invited the applicant; Federal, State, and local government agencies; Indian tribal governments; local organizations; and individuals to participate in the scoping process by providing oral comments at scheduled public meetings or by submitting written comments before the end of the scoping comment period on April 1, 2011. The scoping process included two public meetings, which were held on March 2, 2011, at the Bay City Civic Center, 201 Seventh Street, Bay City, Texas 77414. The NRC issued press releases, purchased newspaper advertisements, and distributed flyers locally to advertise these meetings. Approximately 60 people attended the meetings. Each session began with NRC staff members providing a brief overview of the license renewal process and the NEPA environmental review process. Following the NRC's prepared statements, the floor was opened for public comments. Twenty seven attendees provided oral comments that were recorded and transcribed by a certified court reporter. The transcripts of the comments from these meetings are included at the end of this report. The NRC issued a summary of the scoping meetings on May 19, 2011 (NRC 2011c).

All documents associated with this scoping process are available for public inspection in the NRC Public Document Room (PDR), located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, or from ADAMS. The ADAMS Public Electronic Reading Room is accessible at <http://www.nrc.gov/reading-rm/adams.html>. Persons who encounter problems in accessing documents in ADAMS should contact the NRC's PDR Reference staff by telephone at 1-800-397-4209 or 301-415- 4737 or by e-mail at [pdr.resource@nrc.gov](mailto:pdr.resource@nrc.gov).

In addition to the public comments received at the March 2011 meetings, the NRC received 61 comment submissions related to the scoping of the SEIS. The ADAMS accession number for each transcript and submission is listed in Table 1 of this report.

At the conclusion of the scoping period, April 1, 2011, the staff reviewed the transcripts, meeting notes, and the 48 written communications received and docketed in ADAMS in order to identify individual comments. The 48 written communications of public comments are included at the end of this report and are listed in Table 1. The remaining 13 additional communications received in ADAMS after the closure of the comment period were also considered by the staff, included in this report, and listed in Table 1. Each of the comments was marked with a unique identifier including the Commenter ID (specified in Table 1) and a comment number allowing each comment to be traced back to the transcript, letter, or e-mail in which the comment was submitted. Comments were consolidated and categorized according to the subject areas within the draft SEIS or according to a general topic if beyond the scope of the SEIS. Once comments were grouped according to subject areas, the staff determined the appropriate action for the comment. The action or resolution for each comment is described in the staff's responses in this report.

Table 1 identifies the individuals providing comments and the assigned Commenter ID. For oral comments, the individuals are listed in the order in which they spoke at the public meeting. Accession numbers identify the source document of the comment in ADAMS.

Table 2 (at the end of this report) lists the consultation correspondences received by the staff associated with the scoping process. The accession numbers identify the source document in ADAMS. These consultations will be addressed in the SEIS, as appropriate.

## B. Scoping Participants

**TABLE 1. Individuals Providing Comments During The Scoping Comment Period**

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
Randy Weber	State Representative	Comments from the transcript, afternoon	STP 1	ML110840441
Judge Nate McDonald	Matagorda County judge and local emergency response official	Comments from the transcript, afternoon	STP 2	ML110840441
Mark Bricker	Bay City mayor	Comments from the transcript, afternoon	STP 3	ML110840441
Ron Paul's office representative	U.S. Congressman	Comments from the transcript, afternoon	STP 4	ML110840441
Ed Halpin	STP CEO	Comments from the transcript, afternoon	STP 5	ML110840441
Carolyn Thames	Bay City council member	Comments from the transcript, afternoon	STP 6	ML110840441
Don Booth	Director Local 211 Pipefitter Union of 3,000	Comments from the transcript, afternoon	STP 7	ML110840441
Cheryl Stewart	Bay City Community Development Corporation board member and Bay City Historic Commission	Comments from the transcript, afternoon	STP 8	ML110840441

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
David Dunham	Matagorda County resident	Comments from the transcript, afternoon	STP 9	ML110840441
Owen Bludau	Director of Matagorda County Economic Development Corporation	Comments from the transcript, afternoon	STP 10	ML110840441
Kesha Rogers	Congressional candidate for 22nd Congressional District	Comments from the transcript, afternoon	STP 11	ML110840441
James Lovett	Private citizen	Comments from the transcript, afternoon	STP 12	ML110840441
D. C. Dunham	Bay City Community Development Corporation	Comments from the transcript, afternoon	STP 13	ML110840441
Willie Rollins	Matagorda County resident	Comments from the transcript, afternoon	STP 14	ML110840441
Ian Overton	LaRouche PAC organizer	Comments from the transcript, afternoon	STP 15	ML110840441
John Corder	Brazoria County resident	Comments from the transcript, evening	STP 16	ML110840433
Judge Nate McDonald	Matagorda County judge	Comments from the transcript, evening	STP 17	ML110840433

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
Mitch Thames	Chamber of Commerce, emergency response public information officer	Comments from the transcript, evening	STP 18	ML110840433
Tim Powell	STP vice president	Comments from the transcript, evening	STP 19	ML110840433
Ken Head	Small business owner	Comments from the transcript, evening	STP 20	ML110840433
Mike Bolin	General contractor	Comments from the transcript, evening	STP 21	ML110840433
John Corder	Brazoria County resident	Comments from the transcript, evening	STP 22	ML110840433
Casey Kile	Bay City Babe Ruth (local sport organization)	Comments from the transcript, evening	STP 23	ML110840433
Robert Singleton	Austin resident	Comments from the transcript, evening	STP 24	ML110840433
Karen Hadden	SEED Coalition	Comments from the transcript, evening	STP 25	ML110840433
Bobby Head	Matagorda County resident	Comments from the transcript, evening	STP 26	ML110840433
Tom Kovar	Bay City business owner	Comments from the transcript, evening	STP 27	ML110840433

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
Vicki Adams	Superintendent Palacios ISD	Comments from submitted letters and electronic means	STP 28	ML110730188
Eva Esparaza	Austin resident	Comments from submitted letters and electronic means	STP 29	ML110960078
Darby Riley	San Antonio resident	Comments from submitted letters and electronic means	STP 30	ML110960079
Kamala Platt	NA	Comments from submitted letters and electronic means	STP 31	ML110960080
Marion Mlotok	Austin resident	Comments from submitted letters and electronic means	STP 32	ML110960081
Karen Seal	Lacoste resident	Comments from submitted letters and electronic means	STP 33	ML110960082
Kassandra Levay	San Antonio resident	Comments from submitted letters and electronic means	STP 34	ML110960083
Unknown	NA	Comments from submitted letters and electronic means	STP 35	ML110960084

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
T. Burns	Midland resident	Comments from submitted letters and electronic means	STP 36	ML110960086
Jolly Clark	NA	Comments from submitted letters and electronic means	STP 37	ML110960087
Dale Bulla	NA	Comments from submitted letters and electronic means	STP 38	ML110960088
William Stout	NA	Comments from submitted letters and electronic means	STP 39	ML110960089
C. J. Keudell	Austin resident	Comments from submitted letters and electronic means	STP 40	ML110960090
Tarek Tonsson	NA	Comments from submitted letters and electronic means	STP 41	ML110960091
Carol Geiger	NA	Comments from submitted letters and electronic means	STP 42	ML110960092
Veryan and Greg Thompson	NA	Comments from submitted letters and electronic means	STP 43	ML110960093

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
Robert Singleton	NA	Comments from submitted letters and electronic means	STP 44	ML110960094
Karen Hadden	SEED Coalition	Comments from submitted letters and electronic means	STP 45	ML110960095
Alan Apurim	NA	Comments from submitted letters and electronic means	STP 46	ML110960096
Brandi Clark Burton	Austin resident	Comments from submitted letters and electronic means	STP 47	ML110960097
Carol Geiger	Austin resident	Comments from submitted letters and electronic means	STP 48	ML110960098
Eric Lane	San Antonio resident	Comments from submitted letters and electronic means	STP 49	ML110960099
Jenna Findley	NA	Comments from submitted letters and electronic means	STP 50	ML111010476
Margaret Reed	Austin resident	Comments from submitted letters and electronic means	STP 51	ML111010477

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
Scott and Cyndy Reynolds	NA	Comments from submitted letters and electronic means	STP 52	ML111010478
Jennifer Meador	Austin resident	Comments from submitted letters and electronic means	STP 53	ML111010604
Joy Malacara	Austin resident	Comments from submitted letters and electronic means	STP 54	ML111010479
Melanie and David Winters	NA	Comments from submitted letters and electronic means	STP 55	ML111010506
J. R. Rhode	NA	Comments from submitted letters and electronic means	STP 56	ML111010507
Christine Fry	NA	Comments from submitted letters and electronic means	STP 57	ML111010508
Leona Slodge	Austin resident	Comments from submitted letters and electronic means	STP 58	ML111010509
Carolyn Campbell	Austin resident	Comments from submitted letters and electronic means	STP 59	ML111010510

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
Bryan Dunlap and Todd Rinehart	NA	Comments from submitted letters and electronic means	STP 60	ML111010517
Peggy Cravens	Austin resident	Comments from submitted letters and electronic means	STP 61	ML111010518
Shannon Jurak	Austin resident	Comments from submitted letters and electronic means	STP 62	ML111010519
Thomas Nelms	NA	Comments from submitted letters and electronic means	STP 63	ML111010520
T. Nelms	NA	Comments from submitted letters and electronic means	STP 64	ML111010521
Peggy Pryor	Andrews resident	Comments from submitted letters and electronic means	STP 65	ML110960077
Edmund Kelley	Austin resident	Comments from submitted letters and electronic means	STP 66	ML11105A023
Maria Hogan	NA	Comments from submitted letters and electronic means	STP 67	ML11105A020

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
Randy Weber	State Representative	Comments from submitted letters and electronic means	STP 1	ML11108A059
Beth Larsen	Austin resident	Comments from submitted letters and electronic means	STP 68	ML11119A007
Dzan Nguyen	Austin resident	Comments from submitted letters and electronic means	STP 69	ML11119A008
John Trimble	Austin resident	Comments from submitted letters and electronic means	STP 70	ML11119A010
Aguilar family	NA	Comments from submitted letters and electronic means	STP 71	ML11119A011
Juan Aguilar	NA	Comments from submitted letters and electronic means	STP 72	ML11119A012
Douglas McArthur	Austin resident	Comments from submitted letters and electronic means	STP 73	ML11119A013
Shawn Tracy	NA	Comments from submitted letters and electronic means	STP 74	ML11119A014

<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source</b>	<b>Commenter ID</b>	<b>ADAMS Accession Number</b>
Kelly Simon	Austin resident	Comments from submitted letters and electronic means	STP 75	ML11119A015
NA	NA	Comments from submitted letters and electronic means	STP 76	ML11119A016
Judy Moore	NA	Comments from submitted letters and electronic means	STP 77	ML11119A017
Cynthia Gebhardt	NA	Comments from submitted letters and electronic means	STP 78	ML11119A018
Rory Holcomb	Austin resident	Comments from submitted letters and electronic means	STP 79	ML11119A019
NA	NA	Comments from submitted letters and electronic means	STP 80	ML11119A020

The comments and suggestions received as part of the scoping process are documented in this section where the disposition of each comment is discussed. Each comment received an identifying number for the purpose of discussion in this scoping summary report. The meeting transcripts and written comments are included in their original form at the end of this report.

Comments have been grouped into the following general categories:

1. General Comments in Support of or Opposition to STPNOC, Nuclear Power, or License Renewal for STP
2. Alternatives to License Renewal of STP, Units 1 and 2
3. Socioeconomic Impacts of STP, Units 1 and 2
4. Water Usage

5. Human Health
6. Postulated Accidents
7. Terrestrial or Aquatic Ecology
8. Long-term Storage of Waste
9. Energy Efficiency or Energy Demand
10. Nuclear Liability Indemnification or Compensation
11. Comments Beyond The Scope of NRC's Environmental Review
  - Plant Security
  - Emergency Preparedness
  - Safety and Aging Management of Plant Systems
  - Events at Fukushima Japan

In those cases where no new environmental information was provided by the commenter, only a brief response has been provided to the comment, and no further evaluation will be performed in the SEIS.

The preparation of the SEIS will take into account all the relevant issues raised during the scoping process. The SEIS will address both Category 1 and 2 issues, along with any new information identified as a result of the scoping process. The SEIS will rely on conclusions supported by information in the GEIS for Category 1 issues, analysis of Category 2 issues, and any new and significant information that may cause the conclusions to differ from those of the GEIS. The NRC will issue a draft SEIS (DSEIS) for public comment. The DSEIS comment period will offer the next opportunity for the applicant, interested Federal, State, and local government agencies, Indian Tribal governments, local organizations, and other members of the public to provide input to the NRC's environmental review process. The comments received on the DSEIS will be considered in the preparation of the final SEIS (FSEIS). The FSEIS, along with the staff's safety evaluation report (SER), will provide much of the basis for the NRC's decision on the STPNOC application to renew the licenses of STP. The NRC will issue its Record of Decision in accordance with 10 CFR 51.103 as a part of the issuance of the renewed license, as appropriate.

## C. Scoping Comments and Responses

The staff provides responses to public comments in this section in accordance with 10 CFR 51.29. In providing the responses, the staff identifies the significant issues to be analyzed in depth and eliminated from detailed study the issues that are peripheral or not significant or that have been covered by prior environmental review. For those issues that will not be evaluated further, the staff provides (a) a brief presentation of why the issues are peripheral or will not have significant effect on the quality of the human environment or (b) a reference to their coverage elsewhere.

Scoping comments that are shown below are from the original sources and listed here for ease of reading.

### 1. General comments in support of or opposition to STPNOC, nuclear power, and license renewal for STP

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 1-1, 1-3, 2-1, 4-1, 5-1, 6-1, 7-1, 9-2, 10-3, 11-1, 12-1, 15-2, 16-2, 17-1, 19-1, 20-1, 20-4, 21-1, 22-2, 26-1, 27-1, 27-3, 28-1, 39-1, 56-1, 57-1, 59-1, and 61-1. In summary, these comments are general in nature and express support of or opposition to STPNOC, nuclear power, or license renewal of STP.

Comment 1-1: I am writing to strongly support the license renewal for an additional 20 years of Units [1] and 2 at the South Texas Project Nuclear Operating Company in Matagorda County.

Comment 1-3: I believe nuclear energy plays an important role in the long-term energy future of Texas. There is a growing recognition of nuclear energy's environmental benefits and its role in providing much-needed generating capacity in our state for many years to come.

I strongly support the license renewal for [Units] 1 and 2 at STP and urge the Nuclear Regulatory Commission's favorable consideration.

Comment 2-1: With regards to Units 1 and 2, the culture of excellence that these gentlemen and women have brought forth here at STP Nuclear Operating Company is unparalleled in America, it's well recognized in the industry but also outside the industry now. And we have an opportunity today here, ladies and gentlemen, to move this agenda forward for another 20 years. It's to the benefit of Matagorda County, the State of Texas and all the nation to have folks that do business in this manner continue to do business for just as long as they're viable and willing to do that type of business.

And they've shown in over 20 years of operation now their commitment to excellence and in doing the right thing for the right reasons. They've place safety above profit, they've gone down that path many, many times, and they continue on that path every day. That's the way they conduct themselves. And I can tell you, as the county's top official, it's very, very gratifying to have a company such as this who does place safety of its employees and its citizenry over profits. That's a very, very rare thing in the corporate world, ladies and gentlemen, but it goes on right here in Matagorda County every day.

So, NRC, I thank you again for hosting us. I'd ask, as Representative Weber did, that you would give strong consideration to this renewal. This is one that you won't ever have to back away from. These ladies and gentlemen are committed to excellence and they're going to do a very, very good job for another 20 years should you decide to grant this renewal.

Comment 4-1: Good afternoon. On behalf of Congressman Paul, I am pleased to endorse the proposed license extension of the South Texas Project.

The South Texas Project has been an integral part of the 14th Congressional District and the Matagorda County community for more than 20 years, producing clean, safe and reliable electricity to 2 million Texans.

At this time, Texas is the second largest state in the country, with more than 25 million residents. Along with this growth, the demand for electricity has increased. With the challenges of climate change. Congressman Paul believes that nuclear energy must play a role in our state's energy future for decades to come.

Congressman Paul believes that nuclear generation has significant environmental advantages. Electricity from nuclear is carbon-free, producing no greenhouse gases. And on behalf of Congressman Paul, we fully support the license extension of STP Units 1 and 2 for an additional 20 years.

Comment 5-1: Let me mention that we recognize, as the operating company, that we have a very special trust that you have given us, and that's the trust of putting safety first, so you have our commitment. We've done that for 20-plus years and you have my personal commitment that we'll continue to do so in the future, putting safety first.

Comment 6-1: I want to share with you my perception of the operation of the South Texas Project Nuclear Operating Company. I work with, worship with, and know the employees of this nuclear plant. I trust their work and their judgment in running one of the best nuclear plants in the United States. I wasn't born here; my family chose to live and work here. Our nuclear plant has operated here safely for over 25 years and we feel very safe with STP providing reliable power to our state.

Comment 7-1: Good afternoon. I'm Don Booth. I'm the director of organizing and marketing for Pipefitters Local 211, and from 1984 to 1989 I was a worker on STP Units 1 and 2. I was a pipefitter for Ebasco, I was a foreman and a general foreman. I know the pride we built those units with and the safety we built into them, and I know the seriousness that STP has taken with its environmental impact.

And as a representative of Pipefitters Local 211 of 3,000 members, many of which live in the surrounding communities, we strongly support the renewal of Units 1 and 2. Thank you.

Comment 9-2: In my opinion, for the NRC a look at the record of positives associated with the safe operation of the South Texas Project, through its long established operating history, should be the greatest supporting factor in consideration of the extension of their operating license. Thank you.

Comment 10-3: As you are aware, STP is seeking a construction and operating permit for proposed Units 3 and 4. Matagorda County wholeheartedly supports this expansion. We would not be so wholeheartedly behind the expansion if Units 1 and 2 did not have such an outstanding

and performance record. The uncertainty factor that was here before Units 1 and 2 began operations have been replaced with wholehearted support by proven performance, management and operations.

Matagorda County is pro-nuclear. We fully expect that an extension of the operating permit for Units 1 and 2 will continue STP's outstanding performance, reliability and reputation.

Last week I received my copy of the final EIS statement for Units 3 and 4. It was thoroughly done, very comprehensive. I read many sections of it, and I know that the EIS for Units 1 and 2 renewal will be as thorough and as complete.

On behalf of the MCEDC, Matagorda County Economic Development Corporation, I strongly support the expansion of the permit for Operating Units 1 and 2. Thank you.

Comment 11-1: And as many people may know, if you're familiar with the advocacy of Mr. LaRouche, he has been a proponent of fusion energy technology for quite some time, and this has been my collaboration over the years. And as I said, I'm not just here to advocate for the South Texas plant and the project here, but also for a renaissance in nuclear technology and fusion energy throughout the country.

And this must be the wave of the future and it is the only means of addressing what we face now as a total economic breakdown crisis in our economy. As inflation continues, as you see more and more people left without food, as speculation on food, looking at what's happening with our water resources, it is imperative that not only are we addressing the needs for advancements in nuclear fusion technology here but across the planet.

What I'd like to say is in addressing this global crisis, it is important to realize that there is going to be no economic recovery worldwide without the commitment on the part of the United States to the development of nuclear power and fusion research. Nuclear energy offers a higher energy flux-density and is currently the most efficient than any other power mastered by man.

As a part of the advocacy for a total renaissance in nuclear, I have been a proponent and actively working for the implementation of the North American Water and Power Alliance. It is a large scale bioengineering project which calls for somewhere between 169 million acre feet of water directed from Alaska through Canada, with development of tunnels, pumps, lifts, canals, and the sawtooth lift function of this project will require about 26 gigawatts of power and will require about 30-plus or so nuclear stations to be operable. We could use the 400 megawatts model of nuclear plants such as the GE prism model.

This North American Water and Power Alliance is the vision for the future of mankind, it is a means for solving the long-term needs for mankind for the next 50 years plus in water and resource development. This is also going to pave the way for the development and extraterrestrial imperative for space colonization.

And what I'd like to do is also to add to the records my support for this project and advancements in nuclear projects throughout the country, throughout the planet is a documentation that was drafted by Nuclear Engineer DeWitt Moss entitled "The Sawtooth Lift Nuclear Power Design" and also an overview of the North American Water and Power Alliance Project. Thank you very much.

Comment 12-1: I think that to the long litany of support for the reactors, about the only thing I can add is to just spend one minute on information that I got from other nations. I saw a statistic just today. The U.S. has fewer than 25 percent of the operating nuclear reactors in the world, we have fewer than 25 percent of the proposed or under construction reactors for the next few years. We need more nuclear energy.

Comment 15-2: So what we have to deal with is actually the most important thing we have to be looking at when we're talking about nuclear power and the necessity of expanding our nuclear industry is that the way in which we're going to be able to create resources in the future. You only get enough heat density in a given area through nuclear power to do things like create fresh drinking water, or distill medical isotopes, or other things that civilized society depends upon to create a dignified standard of living for all of its population.

Therefore, one of the most dangerous environmental impacts is the political agenda against nuclear power which, in effect, is also against humanity because humanity needs to progress in the direction of increasing the productive powers of labor and the productive work of society overall -- which is something that STP contributes to, as you've heard, as nuclear power contributes to overall.

And I think that the nuclear station here, given the opportunity, will be a very happy contributor to eventually realizing 6,000 gigawatts of nuclear electricity which is about what's going to be needed to bring the world up to a living standard that is actually acceptable for a species such as ours.

Comment 16-2: We're here tonight to understand that the NRC and the STP are interested in continuing their license. I agree with that. I agree also that in that process their policy should be changed in words that would say that we, STP, will identify to the, for example, Bay City Library, will put in the concerns that are presented to them so that the public will have access to know what they were, what the resolution was, and if it in fact was completed.

*NRC Staff's note: Suggestions for improvement to STPNOC's documentation practices, in addition to general support of STP license renewal, are beyond the scope of the staff's environmental review. The NRC staff is unable to comment on suggestions to STPNOC. A copy of the DSEIS and FSEIS will be placed with the Bay City library for public inspection. Appendix A of the DSEIS and FSEIS will contain comments received during the review and the staff's consideration of the comments.*

Comment 17-1: Ladies and gentlemen, by its very definition, an electric generating station is designed to churn out power seven days a week, 24 hours a day, and hopefully 365 days a year, unless, of course, you have those unforeseen events that come along from time to time.

Just last month we had one of those unforeseen events right here in this county and in many, many parts of the State of Texas. Many, many of the electric generating stations in the state did a fine job; many, many of them fell offline. I can tell you, though, from firsthand knowledge that one of those stations that didn't go offline and that did do a very, very good job was right here in Matagorda County. We had two units of nuclear that operated completely right through every outage that was in this cold snap that we had, and not only that, but did it in a safe and reliable

manner with no reportable injuries, the whole thing. You know, that in itself is plenty to keep this station running for another 20 years.

If we start down the path of all the other ancillary things that this plant has for Matagorda County, it's going to take a heck of [a lot] more than the three to five minutes that I have, so I'm not going to start down that path. But what I will tell you and what I do know from firsthand observation is that this plant is committed to the safety and the well-being of the citizens of Matagorda County, to their employees, and that's what they practice first and foremost is safety, and they do that oftentimes at the expense of profits.

And I can tell you that's a very, very refreshing take on a business model because you don't see that much in corporate America these days, ladies and gentlemen. But we see that and we have that right here in Matagorda County, and all the while having promulgated and carried out that culture of excellence that they practice. They've developed a very good business model that does allow them to produce and does allow them to lead the nation, and even the world, in safe and reliable electric generation.

So that, in a nutshell, for me is what's the very most important thing about consideration for this renewal that we're talking about tonight.

I hope that the NRC will smile favorably upon this plant's request and I'd hope that you would grant it. And if there's ever anything that I or my office or any of the commissioners that serve on the court with me can answer for you, I'd hope that you would call us and ask those questions of us and give us the chance to answer those for you.

We do appreciate you all being here this evening, we do appreciate STP's confidence in us, and we especially appreciate STP's willingness to grow out their legacy for the county by another 20 years in filing this application.

Comment 19-1: I would also just like to state that over the last seven years we have had the top two-unit producing power plant in the United States, and over the last five years the top two-unit producer in the world. We accomplished that by focusing on safety first. Nuclear safety is our number one priority and something that we hold very dear, and we continuously focus on it.

Our employees are active in the community. I think we are an excellent corporate citizen, and we look forward to doing that all the way to 2047 and 2048. We look forward to serving Matagorda County through the production of safe, clean, carbon-free electricity over those extra 20 years. Thank you.

Comment 20-1: I'd like to express it's necessary for the continued growth of our county for you to issue the 20-year continuation of STP. STP employees are some of my top customers and they're the ones that keep our community afloat, as well as our small businesses, our hotels, our food eateries, everywhere else. I would imagine you're staying at some of those fine utilities this evening.

As a long-time resident of Bay City, I've seen the good, the bad and the ugly of STP, and good thing I've never seen any bad or ugly, everything I've seen has been pretty good. And I appreciate the leadership out there that I see sitting around this room that has made that happen.

Comment 20-4: As well, it is my opinion that if the renewal should be given to STP, I think the highly qualified organization out there will continue working on 1 and 2 as they continue to build 3 and 4, and I think you ought to take that into accountability that with the 3 and 4 coming on that they can continue to operate 1 and 2 successfully.

Comment 21-1: There's not much else to say after Ken Head covered the waterfront, and I agree with everything that he said. And I'd also like to, for the record, say that I am absolutely for the continuation of such a good neighbor and a good employer, just a good citizen. Our hopes are that it will continue and that we're for it, and we just wish we had more employers like you in this county. Thank you.

Comment 22-2: So I'm hoping that in the renewal -- and I wish that the plants get renewed, I'm not going to say about nuclear not being safe, et cetera.

Comment 26-1: To back up a few years and tell you things that I've witnessed, back 30 years ago when we were talking about the plant, there was a group of people that decided they were going to protest it. They were from Austin, Boston, Houston, San Francisco, and they rented buses and they came down here, and they put it in the newspaper that they had a thousand balloons that they were going to release into the atmosphere, and that's what would happen if they had a meltdown, this nuclear waste would go like this.

Well, it just so happened that some people from Bay City went out there. As I understand, there was one lady who took her three children out there to see the balloons. And it went into the newspaper that they released the balloons, just happened to be one of those days that the wind was blowing north and they all blew out into the Gulf.

Well, do you realize that today, what we know today, if we were to release a thousand balloons it would be much more detrimental to our environment than what STP has been for 30 years. We couldn't do that. We would make national news if you said we're going to release a thousand balloons, especially in a place where the number one in the nation bird count is.

I'm in a unique position. I'm going to change subjects a little bit. I'm in a unique position, I've worked at STP, I've worked outages out there. I'm one of the few guys, I guess, that's only worked four outages -- I haven't worked the last couple -- but I have been from the very top of the dome to -- what's the room at the very bottom underneath the rods -- number 1. I've been there.

And I will tell you one thing, of all the things I've done in my life, worked in the oil industry, worked on drilling rigs, worked at Dow Chemical Company, I have never ever even come close to the safety that I felt at STP. I'm telling you they spend more time working on safety than anything else. I've never felt one bit -- and not too many people go to room number 1.

And it's kind of funny you go way up in the top and it's really, really hot, and you go way down in the bottom and it's really, really cold, but they call that the hottest place in the plant, room number 1.

But I'm going to tell you, safety, there's nothing like safety at STP. I've never been involved in anything like that.

To say that STP is a good neighbor, no way. They're an awesome neighbor. They have been an awesome neighbor from day one. When they first came here we thought, well, those were the STP guys, and for years, those guys out at STP, those guys out at STP. Well, they're not. They're [our] coaches, they're our sponsors, they're our mothers, our fathers, our brothers, our sisters and our grandchildren that are out there. They are us, they are [our] people.

We love you guys. We appreciate you being here. We want not only Units 3 and 4, we would like the extension of the units there.

Comment 27-1: And I worked at the nuclear plant for five years in the construction phase in the early '80s, and to start with we were kind of skeptical when they were building the STP because there were several setbacks, mainly in the construction companies, not in the STP itself.

But after it was finally built, we were pleasantly surprised for the last 20 years in how it operated and how safe it was, and a large part of that is because of the NRC and how it governs and has safeguards over the nuclear industry...

Comment 27-3: And there's no way that you can have a perfect system when it's run by people and natural disasters. Our greatest nuclear plant in the solar system, the sun, has been operating for billions of years and it has solar flare-ups, and we've been fortunate that none of them have been too great to impact us too greatly.

And in a smaller sense, our smaller nuclear reactor here has the NRC as the buffer. As our distance from the sun is the buffer that keeps us safe, well, the NRC is the buffer against any calamity happening at the nuclear plant.

Comment 28-1: Upon arriving in Palacios about six years ago, I was surprised to learn that we had a nuclear power plant in our school district. Of course at that time, I had the same concerns that many others have about nuclear power and the safety of it, and am guilty of joking about glowing plants and mutated animals. However through the years, I have been very satisfied to witness the safety of the plant. I have two STP employees on the school board who talk frequently about safety precautions that are taken. I have personally toured the plant during an outage and have also allowed students to tour the plant during outages. If I ever felt the safety of my students was at risk, I would never allow them to travel to the plant. Additionally, each year we are sent updated emergency procedures and contacts. I believe that the nuclear plant is an asset to our school district and community and do hope that the license is renewed.

Comment 39-1: I want to see the Decommissioning of the South Texas Project Units 1 & 2, not the Re-licensing.

It makes much more sense to allow these plants to retire in 2027 and 2028 instead of adding another 20 years of operation for these reactors given all of the inherent public and ecological dangers, liability and cost to maintain, repair and mitigate the known hazards.

You can review a summary of the troubled history of these reactors online at [www.NukeFreeTexas.org](http://www.NukeFreeTexas.org).

Comment 56-1: I REJECT THESE ARGUMENTS. I SUPPORT NUCLEAR POWER.

Comment 57-1: Due to my concerns about radioactive waste and danger to the environment and personal safety. I strongly urge that relicensing of these units be halted.

Comment 59-1: I believe the re-licensing of these two reactors should be halted for safety reasons.

Comment 61-1: The re-licensing of these two reactors for an additional twenty years should be halted for safety reasons.

**Response:** *These comments are general in nature. The comments express support of or opposition to STPNOC, nuclear power, or license renewal of STP. The comments provide no new and significant information for the environmental review and will not be evaluated further in the development of the SEIS.*

## **2. Alternatives to License Renewal of STP**

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 12-2, 15-1, 24-3, 25-5, 26-2, 27-2, 27-4, 29-2, 30-1, 31-2, 32-3, 35-2, 36-6, 38-2, 39-3, 40-2, 43-3, 45-3, 46-3, 47-4, 49-2, 51-2, 52-2, 53-2, 54-3, 55-2, 57-2, 59-2, 60-3, 61-2, 62-2, 69-2, 73-2, 74-1, 77-2, 79-2, and 80-2.

**Response:** *These comments refer to energy-source alternatives to license renewal of STP (e.g., wind, solar, etc.), including the “no action” alternative. The staff will evaluate and consider all reasonable alternatives in Chapter 8 of the SEIS as appropriate. Appendix A of the SEIS will include expanded responses to these comments.*

## **3. Socioeconomic Impacts of STP, Units 1 and 2**

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 1-2, 3-1, 5-2, 6-2, 8-1, 9-1, 10-1, 13-1, 14-1, 20-2, 23-1, and 24-1.

**Response:** *These comments address the socioeconomic impacts of STP on local and regional communities and economy, including related issues such as employment, tourism, taxes, and education. The staff will address the socioeconomic impact of renewing the STP operating licenses in Chapters 2 and 4 of the SEIS. In addition, the socioeconomic impacts of not renewing the operating licenses will be discussed in Chapter 8. Appendix A of the SEIS will include expanded responses to these comments.*

## **4. Water Usage**

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 25-4, 29-3, 32-2, 36-5, 37-3, 39-4, 40-3, 41-2, 45-4, 47-2, 51-3, 53-3, 54-2, 55-3, 59-3, 60-2, 62-4, 63-2, 64-3, 67-2, 71-2, 75-2, and 80-4.

**Response:** *These comments address the impact of STP operation on surface water and groundwater use and quality, including the effects of climate change on water availability. The staff will address the direct and cumulative water resource impacts of renewing the STP operating licenses in Chapters 2 and 4 of the SEIS. In addition, the impact of not renewing the*

*operating licenses will be discussed in Chapter 8. Appendix A of the SEIS will include expanded responses to these comments.*

## **5. Human Health**

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 25-1, 29-4, 36-3, and 45-6.

**Response:** *These comments address the impacts of radiation effects on human health. The staff will address the impacts of renewing the STP operating licenses on human health in Chapters 2 and 4 of the SEIS. In addition, the impact of not renewing the operating licenses will be discussed in Chapter 8. Appendix A of the SEIS will include expanded responses to these comments.*

## **6. Postulated Accidents**

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 25-3, 37-2, 39-2, 42-1, 45-2, and 48-1.

**Response:** *These comments address the impacts on human health and the environment associated with postulated nuclear accidents. The staff will address impacts of renewing the STP operating licenses associated with postulated accidents in Chapter 5 and Appendix F of the SEIS. Appendix A of the SEIS will include expanded responses to these comments.*

## **7. Terrestrial or Aquatic Ecology**

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 18-1, 20-3, 44-2, and 45-7.

**Response:** *These comments address the impacts of STP on the terrestrial or aquatic ecology. The staff will address the direct and cumulative impacts of renewing the STP operating licenses in Chapters 2 and 4 of the SEIS. In addition, the impacts on the terrestrial or aquatic ecology associated with not renewing the operating licenses will be discussed in Chapter 8. Appendix A of the SEIS will include expanded responses to these comments.*

## **8. Uranium Fuel Cycle and Waste Management**

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 29-5, 32-4, 33-2, 34-1, 36-2, 37-4, 39-5, 43-2, 45-5, 46-2, 47-3, 49-3, 51-4, 53-4, 54-4, 55-4, 59-4, 61-4, 62-5, 63-3, 64-2, 69-4, 71-3, 75-3, 77-3, 79-3, and 80-5.

**Response:** *These comments raise concerns about (a) transportation of STP-generated nuclear waste, (b) the ability of STP to address stewardship of STP-generated nuclear waste, and (c) uranium mining associated with uranium fuel for STP. The staff will address these comments in Chapter 6 of the SEIS.*

## 9. Energy Efficiency or Energy Demand

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 5-3, 5-4, 42-2, 48-2, 61-3, 62-3, 69-3, and 80-3. In summary, these comments express concerns about energy efficiency or energy demand.

Comment 5-3: I'll mention as well, some have asked me in the back: Why so early on this licensing process? There are many, many reasons for why we're doing this now. One is predictability and stability. I would just mention the fact that Texas has got over 25 million people as a part of it, every day it grows by a thousand-plus, so from an energy stability/predictability standpoint, it is essential that we have it when it comes to electricity. And one only has to look at some of the blackouts that occurred in February and then look really towards the Middle East to appreciate stability.

Comment 5-4: STP has been stable, we have been predictable and we've been safe. When you take a look at our track record, really over the last 20 years, and more specifically over the last seven years, STP Units 1 and 2 have led the nation in total generation of electricity of any two-unit plant. And I'll point out that we've led the world for the last five years in total generation of any two-unit plant or equivalent, throughout the world, and STP Units 1 and 2 are not the largest.

We also, from a cost standpoint, actually have had some performance that's been outstanding for the last 20 years, but last year in 2010 we were the fourth lowest producer in the nation, and all of this is with putting safety first. It is all because we have outstanding employees who do the right things constantly from a human performance standpoint, it's because we've invested in our equipment reliability, and as well, it's because we do put safety first.

Comment 42-2: 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 savings of approximately 2362 MW by 2023. Such savings would nearly offset the net electrical output of 2500 MW from STP Units 1 & 2.

Comment 48-2: 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.

Comment 61-3: Studies have found that energy efficiency and renewable energy sources, which are abundant in Texas, could replace the power generated by these two old reactors.

Comment 62-3: Studies have found that energy efficiency and renewable energy sources, which are abundant in Texas, could replace the power generated by these two old nuclear reactors.

Comment 69-3: Studies have found that energy efficiency and renewable energy sources, which are abundant in Texas, could replace the power generated by these two old nuclear reactors.

Comment 80-3: Safer, cleaner alternative ways to generate the same power exist today and should be used. Studies have found that energy efficiency and renewable sources, which are abundant in Texas, could replace the power generated by these two old nuclear reactors.

**Response:** *These comments express concerns about energy demand or energy efficiency. For comments concerning energy demand (the need for power), the regulatory authority over licensee economics including the need for power falls within the jurisdiction of the States and, to some extent, within the jurisdiction of the Federal Energy Regulatory Commission. The purpose and need for the proposed action (i.e., STP license renewal) is defined in the SEIS as follows:*

*The purpose and need for the proposed action (issuance of a renewed license) is to provide an option that allows for power generation capability beyond the term of a current nuclear power plant operating license to meet future system generating needs, as such needs may be determined by other energy-planning decisionmakers. This definition of purpose and need reflects the NRC's recognition that, unless there are findings in the safety review required by the AEA or findings in the NEPA environmental analysis that would lead the NRC to reject a license renewal application (LRA), the NRC does not have a role in the energy-planning decisions of State regulators and utility officials as to whether a particular nuclear power plant should continue to operate.*

*If the renewed license is issued, State regulatory agencies and STPNOC will ultimately decide whether the plant will continue to operate based on factors such as the need for power or other matters within the State's jurisdiction or the purview of the owners. If the operating license is not renewed, then the facility must be shut down on or before the expiration dates of the current operating licenses*

*This is in accordance with Section 51.95(c)(2) of 10 CFR, which states that:*

*The supplemental environmental impact statement for license renewal is not required to include discussion of need for power or the economic costs and economic benefits of the proposed action except insofar as such benefits and costs are either essential for a determination regarding the inclusion of an alternative in the range of alternatives considered or relevant to mitigation.*

*NRC does not have authority by law or regulation to ensure that the proposed relicensing is the least costly alternative to provide energy services under any particular set of assumptions concerning future circumstances. The staff will consider, in Chapter 8 of the SEIS, the potential for replacement power alternatives to provide the electricity that could be generated by STP, with a renewed license, and the environmental impacts of those alternatives.*

*In summary, the comments as they relate to energy demand (or the need for power) do not provide new and significant information for this environmental review and will not be evaluated further in the development of the SEIS. For comments concerning energy efficiency, the staff will consider energy efficiency in Chapter 8 of the SEIS as appropriate.*

## **10. Nuclear Liability Indemnification or Compensation**

The comment in this category can be found at the back of this report and is labeled with the following identifier: 30-2.

Comment 30-2: If nuclear power risks make sense why has it always been uninsurable since the 1950's? We should phase out nuclear power over the next 15 years, not renew our commitment to it.

**Response:** *The above comment expresses concern regarding nuclear liability indemnification or compensation. Under existing policy, pursuant to the Price-Anderson Act of 1957, owners of nuclear power plants, including STP, are required to carry liability insurance and pay a premium each year for \$375 million of coverage for each reactor unit. In addition, costs associated with catastrophic accidents that result in impacts to the general public are bound by the Price Anderson Act.*

*The Price-Anderson Act was designed to ensure that adequate funds would be available to satisfy liability claims of members of the public for personal injury and property damage in the event of a nuclear accident involving a commercial nuclear power plant. The previously mentioned primary or first tier of \$375 million of coverage insurance is supplemented by a second tier. In the event a nuclear accident causes damages in excess of \$375 million, each licensee would be assessed a prorated share of the excess up to \$111.9 million. With 104 reactors currently licensed to operate, this secondary tier of funds contains about \$11.6 billion.*

*Further information on nuclear liability indemnification is listed at the NRC website:*  
<http://www.nrc.gov/reading-rm/doc-collections/fact-sheets/funds-fs.html>

*This comment does not provide new and significant information for this environmental review and will not be evaluated further in the development of the SEIS.*

## **11. Comments Beyond The Scope of NRC's Environmental Review**

The comments in this category can be found at the back of this report and are labeled with the following identifiers: 10-2, 16-1, 18-2, 22-1, 22-3, 24-2, 24-4, 25-2, 25-6, 25-7, 25-8, 29-1, 31-1, 32-1, 33-1, 35-1, 35-3, 36-1, 36-4, 37-1, 38-1, 40-1, 41-1, 43-1, 44-1, 45-1, 46-1, 47-1, 49-1, 50-1, 51-1, 52-1, 53-1, 54-1, 55-1, 58-1, 60-1, 62-1, 63-1, 64-1, 65-1, 66-1, 67-1, 68-1, 69-1, 70-1, 71-1, 72-1, 73-1, 75-1, 76-1, 77-1, 78-1, 79-1, and 80-2. In summary, these comment express concerns about plant security, emergency preparedness, safety and aging management of plant systems, and the events at Fukushima. These comments are beyond the scope of the license renewal environmental review. This is because the NRC addresses plant performance as part of the ongoing regulatory oversight provided for all currently operating power reactors. Therefore, the NRC does not reevaluate them as part of the license renewal review (10 CFR 54.29 "Standard for issuance of a renewed license" and 10 CFR 54.30 "Matter

not subject to a renewal review.”) Furthermore, the aging management of structures and components within the scope of the license renewal safety review will be addressed in the staff’s safety evaluation report, separately from the environmental review.

## **Plant Security**

Comment 25-7: Security issues continue. Just last week we heard about a Texas Tech student who among his plans was a plan to attack nuclear plants, and I think that needs to be looked at once again as well.

So these and many issues should be addressed. It’s an important decision.

**Response:** *This comment expresses concerns about plant security. As stated during the scoping public meeting of March 2, 2011, comments concerning safeguard and security are beyond the scope of license renewal environmental review. This is because this subject is under the NRC’s ongoing review as a part of the oversight of the current licensing basis. The NRC addresses these areas of performance every day as part of the ongoing regulatory oversight provided for all operating power reactors, including during the STP period of extended operation if the license is renewed.*

*Security issues are periodically reviewed and updated at every operating plant. These reviews continue throughout the period of an operating license, whether the original or renewed license. If issues related to security are discovered at STP, they are addressed immediately. Any necessary changes are reviewed and incorporated in accordance with the STP operating license.*

*Information on the background of nuclear security and past security orders issued by the NRC to nuclear power plants, including STP, can be found at:*

<http://www.nrc.gov/reading-rm/doc-collections/fact-sheets/security-enhancements.html>

*and*

<http://www.nrc.gov/reading-rm/doc-collections/enforcement/security/>

*This comment does not provide new and significant information for this environmental review and will not be evaluated further in the development of the SEIS.*

## **Emergency Preparedness**

Comment 10-2: STP’s focus on emergency management planning and training have greatly enhanced the preparations of our emergency responders to address other types of natural disasters such as hurricanes, tornadoes, pipeline explosions, floods, et cetera. We are much better prepared to address such situations as a result of participating with STP Units 1 and 2 in their emergency preparedness plans and training.

Comment 18-2: The second is from more of a behind-the-scenes type of safety aspect. The Judge has seen fit to have me as one of the PIOs, public information officers, for the county during a lot of

our STP drills, many of which you grade us on every aspect of it. We're very proud of the fact that we set the standard, I think, in the nation, and that's some of the feedback we've gotten from the NRC.

I have been allowed to have information opened up, as the county's PIO. There's never been a piece of information that's been withheld as we go through drills, as situations were faced. We're also educated from a county standpoint, knowing exactly what's going on at the plant in case something should ever happen. It is important for us to be able to stand up and speak to the media, but more importantly, as you know, we're speaking to the citizens of Matagorda County and keeping them safe.

So, on both aspects it's a five-star rating.

We certainly do appreciate you being here, and we thank you so much.

Comment 25-8: I think at this point in time it's also important to note that in the world of emergency planning that the ability to get potassium iodide tablets out to the public seems to have been overlooked. I don't see a lot of information about it. I think it is one approach you could take if there was a serious accident, and that should be looked at. In other places in the country potassium iodide tablets were actually distributed to the community at one point in time so that if there was an accident, you could take it and protect the thyroid from absorption of radioactive iodine.

I don't see that happening here, nor do I see information publicized about that option. You can buy them online, but I don't see anybody even telling people about that.

So I think that we will also be submitting written comments. There [are] other concerns that we have. We'll be looking more in-depth. A lot of issues need to be fully explored, and we look forward to communicating with you further on that front. Thank you.

Comment 29-1: These reactors came online in 1988 and 1989, and they are set to retire in 2027 and 2028. I do not believe they should be relicensed to add another 20 years of operation for these reactors. 30 year old reactors are not safe.

The risks associated with continuing operations are too great. If there was an accident, Houston would not be able to evacuate in a timely manner to avoid harmful exposure.

**Response:** *These comments express concerns regarding emergency preparedness in the unlikely event of a reactor accident at STP. Over the years, the combined efforts of the NRC, Federal Emergency Management Agency (FEMA), STPNOC, Texas State and local officials, as well as thousands of volunteers and local first responders (such as police, firefighters, and medical response personnel), have produced comprehensive emergency preparedness programs that assure the adequate protection of the public in the event of a radiological emergency at STP. The emergency preparedness planning incorporates the means to rapidly identify, evaluate, and react to a wide spectrum of emergency conditions. Emergency plans are dynamic and are routinely reviewed and updated to reflect an ever-changing environment during the operation of STP, including during the period of extended operation if the STP licenses are renewed.*

*The Commission considered the need for a review of emergency planning issues during its license renewal rulemaking proceedings on 10 CFR Part 54, which included public notice and comment. As discussed in the Statement of Consideration for this rulemaking (56 FR 64966), the programs for emergency preparedness apply to all nuclear power facilities. Requirements for emergency planning are in the regulations at 10 CFR 50.47 and Appendix E to 10 CFR Part 50. Through its standards and required exercises, the Commission reviews existing emergency preparedness plans throughout the life of STP, keeping up with changing demographics and other site-related factors.*

*The most recent emergency drill for STP occurred on March 17, 2011. The results of the STP drill are published in a FEMA report and are viewable at the following website:*

<http://www.nrc.gov/about-nrc/emerg-preparedness/related-information/fema-after-action-reports.html>

*These comments do not provide new and significant information for this environmental review and will not be evaluated further in the development of the SEIS.*

### **Safety Issues and Aging Management of Plant Systems**

Comment 16-1: My concern is something that affected me personally that I identified some concerns that I had as time went on, and through the process of the United States Labor Commission I was able to settle my complaints in as much as I was not told ever whatever happened to the results of my complaints.

I'm here tonight to offer to the STP, not only 1 and 2 but 3 and 4, to please make public -- and I've worked with the administration of both 1 and 2 and 3 and 4 -- to make public in as [ ] much as they could put it into the Bay City Library.

Here's the facts, if you're any of these people here -- excuse me a minute to get it correct -- if you're an employee, a contractor, a vendor, personnel or a visitor reporting safety-related or quality concerns, what I'm saying is that whatever those concerns are should be made public, put in a public place.

The pressure on individuals to report something is great when they fear if they're working that they'll be terminated, or maybe they go ahead and get terminated or choose another job, what happens to the concern that they have identified.

We have in this policy of STP that they'll take care of it and NRC will, and I'm sure their intent is very good. What we the people need to know is that whatever that concern was should be identified. That is only part of it. What is the resolution to that concern, and thirdly, whatever happened to the culmination [of] concerns was adequately identified. Even if the person wanted to be anonymous, it's still important publicly regarding what emphasis it has to the NRC or to the project, it's important to the public.

*NRC staff's note: Suggestions for improvement to STPNOC's documentation practices, in addition to plant safety concerns, are beyond the scope of the staff's environmental review.*

*The NRC staff is unable to comment on suggestions to STPNOC. A copy of the DSEIS and FSEIS will be placed with the Bay City library for public inspection. Appendix A of the DSEIS and FSEIS will contain comments received during the review and the staff's consideration of the comments.*

Comment 22-1: As I said earlier, I had the pleasure of working on 1 and 2 for about five years. I've also had the experience of overseeing quality control for the company I've worked for about 30 years in quality control, and I've been personally on five nuclear plants. This has been one of them.

To more elaborate on what I just said, my concern is having worked with the STP present administration and the Units 3 and 4, I'm really not satisfied that they had the openness that I expected when it come to personnel for the individual workers or those that are here in these categories that I mentioned.

I would admonish all of us to always keep tabs on the installation itself, feel free that you can ask questions and if there's any questions that ever come from a worker. It is very difficult for a lot of people to identify a problem. They feel threatened by it, and frankly, that is a real concern, been there...

I am only saying that I am hoping that we have more of openness with the community or for those that have any questions about the safety or any concern, whether it be for personnel protection, plant safety or for the administration of how they do their policies.

I was working with 1 and 2 and 3 and 4 on those policies they have which said about the openness, and that's what I said is that I hope that we can have, like the person said before, it will be in the library, but really I want the concerns to be there so that we can look at them and get them resolved.

And I wish STP good luck.

*NRC staff's note: Suggestions for improvement to STPNOC's documentation practice, in addition to plant safety concern, are outside the scope of the staff's environmental review. The NRC staff is unable to comment on suggestions to STPNOC. A copy of the DSEIS and FSEIS will be placed with the Bay City library for public inspection. Appendix A of the DSEIS and FSEIS will contain comments received during the review and the staff's consideration of the comments.*

Comment 24-2: I want to talk mainly about safety tonight. And I know that when you're living here, the plant is just something that's always been there, but my thinking about safety at nuclear power plants is sort of: Yeah, they've got redundant safety systems because there are redundant dangers. The analogy I like to think of is if I'm walking through a construction site wearing a hard hat and a brick falls six stories and bounces off my helmet, my first thought is not thank God the helmet worked, my thought is who dropped the brick.

If you want to know what's going on with nuclear power plants and you support this plant, I'm going to challenge you to do one thing, and that is tomorrow morning go to the NRC website, [www.nr\[c\].gov](http://www.nr[c].gov), and click on event reports and click on current events. If you do this for a couple of

days a week, you're going to be convinced that nuclear power plants routinely have near misses that could have catastrophic results.

Nuclear power is the only form of energy generation that has the potential for killing thousands of people in one single event. I mean, if you're investing in wind, what's the worst that can happen? You have a catastrophic accident, you don't generate power and maybe some sheep were inconvenienced. Nuclear power has the capacity to kill people, it's a dangerous technology. All you have to do is look at Chernobyl and Three Mile Island.

How many of you have ever heard of SL1? It was an experimental reactor in Idaho that in the early '60s had a fatal accident. There was one gentleman that was actually pinned to the ceiling of the containment building by a rod when there was a steam explosion in the plant. It impaled him to the ceiling stuck on a control rod.

Nuclear power can and has caused human fatalities. Read about Chernobyl. I know that NRG [NRG Energy] is going to say well, new reactors are safer, but they're saying this in a way that causes me to ask this question. When they're talking to you about 3 and 4, they say these plants are newer and safer, or safer and more advanced than the old plants. Well, they're also arguing for extending the life of the old plants which had a limit on their life in the first place for a reason: we didn't know how long you could run a nuclear power plant; we still don't.

Turkey Point in Florida, they had to replace the steam generators in the plant, and to replace a steam generator you have to cut a hole in the containment building, you have to take the generator out and put the new one in. Well, what they found was that the cement inside the containment building had degraded over the last 20 years, there were immense cracks that ran through the inside of the structure.

And that is what happens when you extend the life of a nuclear plant. These things were designed to have a limited life for a reason. They're not going to safe forever.

Comment 24-4: There are alternatives, and I really think that there's not enough proof that a plant can be run longer than the time period in which the engineers that designed it said it was designed to be built. They're talking now about running some nuclear plants for 60 years. My question is this because they're so much safer than they were thought to be originally, or is this because the people that run nuclear power plants say if we close it down we don't make any money; if we continue to run it, sure they'll be less safe than they were, but as long as they don't actually melt down, we're going to continue to make money. I think you'll find out that's what it is.

And also don't let NRG [NRG Energy] give you this talking out of both sides of their face where they say the 3 and 4 are going to be better and newer, at the same they're talking about extending the life of what then could be argued are the older and the less safe plants. Can't have it both ways, and there are definitely alternatives.

Comment 25-2: Another issue is control rods. There were problems when the new reactor heads were put on, the control rods got stuck. This is actually happening at many different reactors right now. And there have been some flaws in construction of some of the equipment involved. So I think during this process that there should be a thorough analysis of the control rods, their drive

mechanism, and so on and so forth, and see if there are any problems technologically with the parts that are here and being used.

I share the concerns mentioned by Robert Singleton about embrittlement as the plants age. These reactors were not designed to run forever; they were designed to be closing down about this time, and the first five years and the last five years of a nuclear reactor's life cycle are the ones where they have the most risk, and I think we should bear that in mind during this process and do analysis on that front.

Comment 25-6: The reactor head that's stored onsite, I think as part of this process it should be looked into about how carefully shielded that is, is it adequate. Maybe it is, maybe it isn't. But I think that should be looked at.

Comment 41-1: Dear Sir, I am writing a request that relicensing of South Texas Project Reactors 1 & 2 be halted for the following safety concerns regarding...

The risks of an accident, fires or explosions at one or more reactors at site could increase with [ag]ing.

Comment 51-1: I am writing to you with concerns about the relicensing of two South Texas nuclear reactors. The relicensing of these two reactors for an additional twenty years should be halted for safety reasons. The risks of an accident, fires, or explosions at one or more reactors at the site could increase with aging reactors.

Comment 55-1: It is our request that the re-licensing of South Texas Project Reactors 1 & 2 be halted for an additional twenty years because of the following:

-the risks of an accident, fires, or explosions at one or more reactors at the site could increase with aging reactors

Comment 62-1: The relicensing of these two reactors for an additional twenty years should be halted for safety reasons.

The risk of an accident, fires, or explosions at one or more reactors at the site could increase with aging reactors.

Comment 67-1: Please make sure all safety standard are followed in regards to the regarding South Texas Project Units 1 & 2, NRC 2010-0375 Docket Nos. 50-498; 50-499 relicensing.

Halt for safety reasons. Aging reactors must be held to a higher safety standard before a tragedy occurs.

We count on you to watch out for our best interest so please make sure the correct action is taken. Stop the reactors and help ensure we are all safe.

Comment 68-1: The re-licensing of these two reactors for an additional twenty years should be halted for safety reasons. The risks of an accident, fires or explosions at one or more reactors at the site could increase with aging reactors.

I ask for your very careful analysis of this situation and protect the citizens of Texas.

Comment 69-1: The re-licensing of these two reactors for an additional twenty years should be halted for safety reasons.

The risks of an accident, fires, or explosions at one or more reactors at the site could increase the aging reactors.

Comment 75-1: The re-licensing of these two reactors for an additional twenty years should be halted for safety reasons.

The risks of an accident, fires, or explosions at one or more reactors at the site could increase with aging reactors.

Comment 71-1: I and my family are urging you to stop the relicensing of South Texas Project reactors 1 & 2. Safety reasons are our main concern. With age the risk of accident, fire, or explosion increases.

Comment 73-2: I have serious concerns regarding the re-licensing of the above-referenced units [units 1 and 2] of the South Texas Project. While these concerns deal mainly with operational and waste-related safety, I am, in addition, opposed to the Texas increasing reliance on nuclear power generation due to high and uncertain cost.

Comment 80-2: My family and I feel that the re-licensing of these two reactors for an additional twenty years should be halted for safety reasons. The issues of accident, fire, or explosions at one or more reactors at the site could increase with aging reactors.

Comment 79-2: The re-licensing of these two reactors for an additional twenty years should be halted for safety reasons.

The risks of an accident, fires, or explosions at one or more reactors at the site could increase the aging reactors.

Comment 72-1: I and my family are urging you to stop the relicensing of South Texas Project reactors 1 & 2. Safety reasons are the concern ...

**Response:** *These comments express concerns about the safety issues and aging management of STP plant systems. The aging management of structures and components within the scope of the license renewal safety review will be addressed in the staff's safety evaluation report for STP. This is separate from the environmental review which focuses on the environmental impacts of license renewal. The comments have been provided to the license renewal safety review team for consideration in the development of the SER as appropriate.*

*In the safety review, the staff examines STPNOC's programs and processes designed to manage the effects of structures and components aging and to ensure adequate protection of the public's health and safety during the 20-year license renewal period. This may result in additional aging management measures as necessary.*

*These comments do not provide new and significant information for this environmental review and will not be evaluated further in the development of the SEIS.*

*Portions of the comments relate to the environmental impacts of postulated accidents. The staff will evaluate the environmental impacts of postulated accidents in Chapter 5 of the SEIS.*

## **Events at Fukushima Japan**

Comment 31-1: Because of the troubled history of the South TX nuclear reactors, because the systems are not designed to last without major, expensive rebuilding, because the accidents (most recently in Japan) have only begun to illustrate what major effects are possible from a failed plant, I urge the denial of the relicensing of the STP.

Comment 32-1: In light of the nuclear disaster unfolding with the Fukushima nuclear reactors and considering that the aging reactors at STP are of the same design, I urge that the renewal application be rejected. The dangers from them aging, their design and operator failure are potentially too great to relicense them past their current license expirations. Hurricanes have been getting stronger and that presents yet another danger.

Comment 33-1: I oppose the continued licensing of STP 1 & 2... We have seen from the situation in Japan what a power outage can do to a nuclear power plant.

Comment 35-1: I would like to express my concerns with extending the license on these two units. This project has had a history of accidents that I find quite disturbing. I fear that these units, which are already 20 years old, will be a huge safety risk to our community.

Comment 35-3: Just in recent years the gulf coast has been victim to several natural disasters. Let's take a lesson from the plants in Japan and forget this huge risk to the safety of the people of Texas.

Comment 36-1: I appreciate the opportunity to comment on the proposed license renewal/extension for South Texas Nuclear Project Plants 1 and 2. I was living in San Antonio when this project was debated and under construction. I will be moving back to San Antonio in the next year to retire. I have followed the history of STP for a long time. I oppose extension of the licenses for these Units.

I believe American industry is equally prone to overstating its safety records, safety concerns, and competency, as [T]EPCO has done in this crisis. I also know that there have been a number of serious, sometimes unreported, usually understated safety violations over the years at STP.

Comment 36-4: STP was predicted to last 30 years. I agree with the UCS bathtub curve. Start up and end of life times are the most dangerous. We see the increased cracks and problems as they age. Yankee Nuclear should be shut down after all the safety violations and water contamination. There is strong likelihood STP units will be in similar condition.

Comment 37-1: I have copied some of the facts below, but want to add my personal comments. In light of the disaster in Japan, and all of the other Nuke accidents and inspection complaints

which are NOT publicized or fixed in an adequate way, to extend the life of these two Nukes would be height of stupidity. Remember Katrina (A Texas landfall would have been disastrous to the nukes) and the fact that environmental storms are increasing in their size and devastating nature, we can not afford to take the chance of letting these operate for an additional 20 years.

Knowing banks will bet on a skunk race if they believe they can make a profit – the sub-prime crisis, credit swaps and the savings and loan debacle being prime examples – I am doubly dubious about backing the nuke because the major banks are refusing to bankroll new nukes unless the government gives them 100% coverage of debt. When pirates shy away from fleecing the public for lucrative profits, you just know it is a “pig in the poke”. These reactors came online in 1988 and 1989, and they are set to retire in 2027 and 2028. The re-licensing would add another 20 years of operation for these reactors.

Comment 38-1: I want to see the Decommissioning of the South Texas Project Units 1 & 2, not the Re-licensing. I guess supporters of that project will say these units are different and safer than the nuclear plants in Japan. But I do not want to wait until it is too late to find out!

Comment 40-1: I am asking that you do not re-license these two reactors for an additional 20 years. Nuclear power has some benefits, but it also has some risks as demonstrated by the recent disaster in Japan. At the point in time, I feel that the U.S. should move away from nuclear and oil as primary energy sources. Let's develop more renewable options. Also, as you know, nuclear power supplies require a lot of water for cooling purposes.

Comment 43-1: I would like to ask that you recommend that the South Texas nuclear Units 1 and 2 be decommissioned and their applications for renewal be denied. As we have seen in [Japan] the last few weeks, nuclear energy is not as safe as made out to be, and there are too many problems with disposal that have not been solved. Here in Texas we have a wonderful abundance of sun as well as wind, neither dependant on other countries. We should be making use of these natural resources which are safer, reduce use of scarce water, and can't be used as political weapons.

Comment 44-1: In light of the events in Japan in the last month, the NRC should delay any license extensions until the events that led to the problems at Fukushima Daiichi can be fully examined, and the Commission can determine that the South Texas reactors could not suffer the same kind of loss-of-power accident. The Commission should also study the spent fuel pools at South Texas to make sure that they have guaranteed back-up power in the event of a natural or man-made disaster.

Comment 45-1: There are many issues of concern regarding re-licensing of STP Reactors 1 & 2. We oppose re-licensing and believe the reactors should be shut down by their original retirement dates – in 2027 and 2028, or sooner and that adding 20 more years of operation could lead to unsafe conditions.

At least one of the troubled Fukushima reactors in Japan had just been re-licensed, and the situation would likely have been less severe if this reactor had been decommissioned. SEED Coalition has previously submitted comments as interveners and provided oral comments at a public hearing. We would like to again raise concerns about the risks of an accident, fires, or explosions at one or more reactors at the site, risks that could increase with aging reactors.

Comment 46-1: It is unfortunate that my attention to the matter was not begun sooner; (I learned of it only this evening from an e-mail sent earlier this afternoon) as I was unaware that the re-licensing process was underway, and hope that I have not missed today's deadline for commenting as a public citizen.

Regarding the proposed re-licensing (Docket ID # NRC-2010-375) of South Texas Project Units 1 & 2, I do not understand the need for going forward with this action over 16 years before their planned service period ends. At least delay this until next year, [so] that more scientific information will be available as a result of studies of the Japan disaster, and a better true-cost evaluation can be made.

It makes much more sense to retire these plants as planned in 2027 and 2028, instead of trying to extend their use another 20 years, given the rapidly evolving technology of the decade that will likely make them obsolescent. I'm opposed to their continuation for all the usual reasons that any kind of accident and even a Category 4 or 5 hurricane-induced storm surge could remove external supports such as cooling ponds or water access (and who knows what hammering debris-laden waves on top of the storm surge could do), plus disposal of nuclear waste – no human technology is foolproof and totally isolated for thousands of years!

Comment 47-1: I beseech you to not extend the life of STNP Reactors 1 & 2. For public safety and environmental reasons, the continuation of this cannot be justified. Aging plants that are at risk of failures or explosions should not be kept active. As we have seen in Japan, being able to keep the reactors cool is essential for public safety and the integrity of the process. We have limited access to fresh water that can be used for this facility – the priority should be for drinking water, livestock and farming.

Comment 49-1: ...absolutely not. To renew STP for another 20 years is gambling with the lives of Americans. The Japanese disaster is a red alert that we cannot continue down the nuclear path... Every nuclear power plant is a potential disaster waiting to happen and every nuclear power plant is a long term disaster by the toxic waste they generate. Do not renew the life spans of any nuclear power plant in this county.

Comment 50-1: Looking at recent events that we are dealing with in Japan, I see no reason to extend the life of these reactors. The risks far outweigh the benefits. With age things tend to break down causing accidents and fires. With other ways to produce power, that is safer and cleaner I see no reason to put more money into this cause.

Therefore I am asking that the re-licensing of these reactors be halted immediately. I'm opposed to their continuation for all the usual reasons that any kind of accident and even a Category 4 or 5 hurricane-induced storm surge could remove external supports such as cooling ponds or water access (and who knows what hammering debris-laden waves on top of the storm surge could do), plus disposal of nuclear waste – no human technology is foolproof and totally isolated for thousands of years!

Comment 52-1: In light of the recent tragedy in Japan we are writing to please your cooperation in halting the re-licensing of the South Texas Project nuclear reactors.

Based on what we've read these two reactors have had trouble in the past and put Texas citizens at a great risk.

NOW is the time to make a commitment to safer and renewable energy sources.

Comment 53-1: The re-licensing of these two reactors for an additional twenty years should be halted for safety reasons, particularly in light of the recent events in Japan.

The risks of an accident, fires, or explosions at one or more reactors at the site could increase with aging reactors.

There is no adequate solution for radioactive waste so it makes no sense to continue generating more.

Comment 58-1: In view of current "blackout," tragedy in Japan should be rebuilt, replace before relicense.

Comment 60-1: Please do not relicense these reactors for an additional 20 years. If the crisis in Japan or last year's Gulf oil spill has taught our nation anything it is that we will be defeated by nature if we continue our careless energy practices.

Comment 65-1: Dear Ms Gallagher, please do not fund south Texas power plants. Please delay all nuclear funding or renewing power plants. Japan HAS BEEN A WAKE UP CALL TO STOP NUCLEAR AND FIND BETTER SOLUTIONS DON'T WAIT TOO LATE TO END THIS DEVASTATION TO OUR EARTH AND PLANET. SHOW US THE NRC REALLY CARES FOR OUR PLANET AND ITS PEOPLE. SAY NO TO SOUTH TEXAS POWER PLANT.

Comment 66-1: The Japanese nuclear disaster is evidence that "safe" power is not available in such power reactor ... We cannot continue to ... water resources to support nuclear power ...

Comment 70-1: These should not be approved due to their age and design. There is no adequate storage that will not affect our water supply. Just like Japan, it cannot happen here – until it does.

**Response:**

*These comments express concerns about the safety issues and aging management of STP plant systems in comparison to the accident at Fukushima Japan. The aging management of STP structures and components within the scope of the license renewal safety review will be addressed in the staff's safety evaluation report (SER) for STP. This is separate from the environmental review which focuses on the environmental impacts of license renewal. The comments have been provided to the license renewal safety review team for consideration in the development of the SER as appropriate.*

Fukushima lessons learned. On March 11, 2011, a massive earthquake off the east coast of Honshu, Japan, produced a devastating tsunami that struck Fukushima. The six-unit Fukushima Dai-ichi nuclear power plant was directly impacted by these events. The resulting damage caused the failure of several of the units' safety systems needed to maintain cooling water flow to the reactors. As a result of the loss of cooling, the fuel overheated, and there was

*a partial meltdown of the fuel contained in several of the reactors. Damage to the systems and structures containing reactor fuel resulted in the release of radioactive material to the surrounding environment.*

*In 2011, the Commission directed the staff to convene an agency task force of senior leaders and experts to conduct a methodical and systematic review of the relevant NRC regulatory requirements, programs, and processes, including their implementation, and to recommend whether the agency should make near-term improvements to its regulatory system. As part of the short-term review, the task force concluded that, while improvements are expected to be made as a result of the lessons learned from the Fukushima events, the continued operation of nuclear power plants and licensing activities for new plants do not pose an imminent risk to public health and safety (NRC 2011).*

*The NRC will continue to evaluate the need to make improvement to existing regulatory requirements based on the task force report and additional studies and analyses of the Fukushima events as more information is learned. To the extent that any revisions are made to NRC regulatory requirements, they would be made applicable to STP regardless of whether or not STP has a renewed license. The task force report and other information on the ongoing lessons learned are available for public inspection at the NRC web site:*

<http://www.nrc.gov/reactors/operating/ops-experience/japan-info.html>

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10 CFR 54. *Code of Federal Regulations*, Title 10, *Energy*, Part 54, “Requirements for Renewal of Operating Licenses for Nuclear Power Plants.”

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