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Calvert Co Citizen

RAS CC-12

DOCKETED USNRC
January 25, 2012
OFFICE OF THE SECRETARY
RULEMAKINGS AND ADJUDICATIONS STAFF
Docket No. 52-016-COL

Jan 24, 2011 Limited Public Hearing on Calvert Cliffs 3 Contention

First of all, I would like to thank the Atomic Safety Licensing Board for giving the public this opportunity to provide input to the hearing on Calvert Cliffs 3. The focus of the hearing is the environmental impact of Calvert Cliffs 3 and many aspects of environmental issues have not been considered. For example, the capability and capacity of solar energy which is truly clean energy has been downplayed to make it appear as if nuclear is better when in fact nano technology such as **Strong Enhancement of Solar Cell Efficiency Due to Quantum Dots with Built-In Charge will increase by 50% the power conversion efficiency of solar cells. This nano technology was proven by our own U.S. Army Research Laboratory in Adelphi, Maryland in cooperation with the University of Buffalo in NY.** Please take this into consideration in your judgment of the Contention against Calvert Cliffs 3.

Calvert Cliffs 3 is highly undesirable for the environment here in Maryland because there are already 11 working nuclear power plants on the Chesapeake Bay watershed and Calvert Cliffs 3, a double reactor, will increase that count to 13 nukes, the combined environmental effect of nukes on the Chesapeake Bay has not been determined to warrant such a controversial addition of CC3. Furthermore, this applicant, UniStar in particular, has asked for waivers of the NRC standard so they may increase the amount of radioactive pollution CC3 would release to the waters of the already dying Chesapeake Bay.

We have all heard of the Fukushima nuclear disaster in Japan and we here in Calvert and Saint Mary's counties have felt the shock waves of the most recent earthquake in Virginia that shut down nuclear reactors and damaged the North Anna Nuclear Power Plant. What is most disturbing is that the physical location of Calvert Cliffs 3 has strong indications of an earthquake fault traversing the Calvert Cliffs Nuclear Power Plant property just south of the power block of the proposed Unit 3. Scientific evidence, 4 separate ones in fact, support that a fault line exists from the Chesapeake Bay at Moran Landing and goes clear across Calvert Cliffs property on the south side, crosses Route 4, and extends all the way to Mears Cove. This fault line is only a half mile from the proposed CC3 cooling tower and crosses over where the major distribution of natural gas pipelines of their neighbor, Dominion LNG are located. Building Calvert Cliffs 3 at this location is a recipe for environmental disaster and undue safety risk not only to the residents of this peninsula in Calvert County, but also to our nation's seat of government in Washington, DC, which is within the 50 mile nuclear pathway.

To make matters worse, UniStar has submitted seismic documentation to the NRC which is full of errors, omissions and misrepresentations of the seismic condition at Calvert Cliffs. In spite of the scientific evidence cited and supporting documentation submitted to the applicant, UniStar, and to the NRC, UniStar has continued to suppress the evidence that they have to this day, NOT tested whatsoever, the area of the fault line on their property. Sampling with boreholes and other scientific testing was recommended by concerned scientists in April 2010 and again in July 2010, but all these were ignored by UniStar. When the US Army Corps of Engineers asked UniStar in July 2010 to provide an answer to the seismic issue presented to them and NRC at that time, UniStar was silent on it until November 2010 when they eventually responded back with a letter that claimed their flyovers of the area could not find the fault. Scientifically determining a fault line especially in our area is not done by flyovers, in fact, that is a laughable excuse even to the lay person. UniStar in addition to skirting the seismic issue, did not respond either to the errors, omissions, and misrepresentations in their seismic documentation submitted to the NRC. These seismic documents which UniStar submitted to the NRC were reviewed by the scientist whose study they used, but was found by same scientist, Dr Susan Kidwell, to be a misrepresentation of the facts contained in her 1997 scientific paper.

All of these evidence and supporting documentation were submitted to the project managers of NRC in April and in July 2010. When the Final Environmental Impact Statement (FEIS) was released, although the NRC stated that these issues were under consideration by their staff, the NRC seismic staff on Nov 1, 2011, denied having had any knowledge of it. All of these documents submitted to the NRC on the seismic condition at Calvert Cliffs have ADAMS accession numbers

for reference, and these ADAMS numbers were also referred to in the FEIS which is the subject of contention. We urge the ASLB to look into these issues as they have environmental impacts.

The seismic condition at Calvert Cliffs needs to be investigated and tested to determine the extent and direction of the fault line for its environmental impact as well as the safety impact to the public and to the environment. It cannot be ignored as if it does not exist which is what the applicant, UniStar wants to do and has in fact been doing since the matter was brought up at state level in 2009. We the public have our tax dollars at stake when federal subsidies are granted to fund nuclear power which is what Calvert Cliffs 3 has been asking. On top of this, UniStar is wholly owned by a foreign entity, the French government through EDF, and therefore does not even qualify as an applicant for a nuclear power plant as this is against the law. So in summary, why do we continue to process UniStar's application when these following conditions exist:

1. UniStar for Calvert Cliffs 3 has been wholly foreign owned for many months now and by law does not qualify as an applicant, so we urge the ASLB to immediately disqualify UniStar/EDF's application for a license.
2. UniStar has submitted documentation to a Federal Agency, the NRC, which is full of errors, omissions, and misrepresentation of the facts, especially in the seismic issue. This is also against the law and they have also violated the public trust. What we ask the Atomic Safety Licensing Board to do is to stop the licensing process immediately and issue a ruling to deny UniStar/EDF a license to construct a nuclear power plant.

The above two requests are well within the power of the ASLB and we respectfully request that the ASLB exercise this power.

The NRC is a federal agency sworn to protect the public and the environment in exercising their power through the licensing process of nuclear plants. We the public, are asking that the NRC hold true to their mandate and uphold the public trust.

Thank you.

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