

PMFermiCOLPEm Resource

From: Art Myatt [almyatt@yahoo.com]
Sent: Tuesday, March 05, 2013 11:48 AM
To: Olson, Bruce; Fermi3COLEIS Resource
Subject: Comments Re: FEIS NUREG 2105
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Attached are my comments for the Fermi 3 Final Environmental Impact Statement.

Art Myatt

“Conventional economics is a form of brain damage.” - David Suzuki

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Mail Envelope Properties (1362502062.32554.YahooMailNeo)

Subject: Comments Re: FEIS NUREG 2105
Sent Date: 3/5/2013 11:47:42 AM
Received Date: 3/5/2013 11:47:49 AM
From: Art Myatt

Created By: almyatt@yahoo.com

Recipients:

"Olson, Bruce" <Bruce.Olson@nrc.gov>

Tracking Status: None

"Fermi3COLEIS Resource" <Fermi3COLEIS.Resource@nrc.gov>

Tracking Status: None

Post Office: web125903.mail.ne1.yahoo.com

Files	Size	Date & Time
MESSAGE	164	3/5/2013 11:47:49 AM
F3 Final EIS comments.doc	23616	

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Priority: Standard
Return Notification: No
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Expiration Date:
Recipients Received: Follow up

5 March 2013

U.S. Nuclear Regulatory Commission
Environmental Projects Branch 2
Division of New Reactor Licensing
Office of New Reactors
Washington, DC 20555-0001

Email to: Bruce.Olson@nrc.gov and Fermi3.COLEIS@nrc.gov

Comments Re: FEIS NUREG 2105

In their application to the federal government, to explain why Fermi III would be needed, Detroit Edison relied on a 2006 study done by the Michigan Public Service Commission (MPSC), "Michigan's 21st Century Energy Plan," published in January of 2007. On page 9 of that document, the study said specifically, "Michigan's total electric generation requirements are expected to grow at an annual average rate of 1.3 percent from 2006 to 2025 – from 112,183 gigawatt hours (GWh) to 143,094 GWh."

The Energy Information Administration (EIA), a branch of the federal Department of Energy, keeps track of the actual electrical consumption of each state. According to the EIA, actual electrical consumption in Michigan from 2006 through 2011 (the most recent year for which figures are available) was far below the MPSC projections. Instead of steadily growing, Michigan's demand for electricity has erratically declined.

Year	MPSC GWh	Actual GWh	MPSC Error
2006	112,183	108,018	3.71%
2007	113,641	109,927	3.27%
2008	115,119	105,781	8.11%
2009	116,615	98,121	15.86%
2010	118,131	103,649	12.26%
2011	119,667	105,053	12.21%

By the end of 2011, the MPSC had overestimated Michigan's electrical needs by 14,614 GWh. This number is too large to make any sense to most of us, so some comparison is in order.

The EIA says, in the Frequently Asked Questions section of their website, "In 2010, the average annual electricity consumption for a U.S. residential utility customer was 11,496 kWh." 14,614 GWh is equal to 14,614 million kWh, so the error in the MPSC's projection is (so far) equivalent to the electrical usage of just over 1 and a quarter million average households.

According to section 3.2.1 of the Fermi 3 Combined License Application, the plant should have "... a net electrical output of approximately 1535 ± 50 MWe." That's 1535

Megawatts, the same as 1.535 GW. We can translate GW into GWh of expected annual output for Fermi III. Multiply 1.535 GW times 24 (hours per day) times 365 (days per year) times 80% (utilization factor). That gives us an expected annual output of 10,757 GWh for Fermi III, plus or minus 440 GWh.

In short, by the end of 2011, the MPSC error was considerably greater than Fermi III's expected annual output. Given the past performance of their model, we can reasonably expect the error to grow even larger in the future. Even putting aside all considerations of cost and safety, there is no need - *as Detroit Edison defined need* - to build Fermi III.

In the Final version of the EIS [Environmental Impact Statement for the Combined Licence (COL) For Enrico Fermi Unit 3 Final Report], Chapter 8, entitled "Need for Power," covering pages 8-1 through 8-26, the above noted discrepancy between MPSC projections and the realities of electrical demand in the DTE service area have been both recognized and denied.

The recognition is cursory. Essentially, it is contained in the first paragraph of 8.2.4. It says, "Because the MPSC 21st Century Electric Energy Plan was completed in 2007, it did not include any potential shifts in the demand for electricity due to the economic downturn that began in late 2008." What it does not say is that the drop in electrical demand has already produced a permanent gap between projection and reality greater than Fermi 3's generating capacity. This would be a permanent gap because, even if a pattern of growth in demand were to resume, the gap between real demand and projected would remain.

The denial is extensive. It involves a convoluted effort to rehabilitate the MPSC projections by comparing the MPSC projections of "peak summer demand" with projections of "peak summer demand" from an independent source for a much larger area.

First, facts have shown the MPSC projections to be seriously in error. There is no way that any sort of analysis can produce more than an illusion of reliability for predictions that have been demonstrated to be wrong.

Second, "peak summer demand" is not anywhere close to the correct basis for proving the need for a nuclear power plant. Peak demand, according to the conventions of the electrical power industry, is best met by plants powered by natural gas; plants which can easily be started and stopped according to hour-to-hour demand. Nuclear power plants are generally considered to be good for meeting base load demand. In addition, photovoltaic panels are even more suited for meeting peak summer demand than natural gas powered generating plants, since they automatically generate the most electricity during the days of summer.

Third, both the MPSC study and the 2010 ReliabilityFirst study that was used to rehabilitate the first study share a very simple assumption about continued growth in demand based on steady economic growth for the foreseeable future. This assumption may or may not be true. Political and business leaders certainly hope it is true. Political leaders in particular make efforts intended to stimulate economic growth. The success of these efforts is not guaranteed.

The fact is that, Detroit, which is at the center of the DTE service area, has experienced economic and population decline for at least the last 30 years. That's enough to call the declines a long-established trend. It's also a fact that the state of Michigan actually lost population between the 2000 census and the 2010 census, causing it to lose one seat in the House of Representatives. That's not yet a long-established trend for the whole state, but it is certainly not an indication that economic growth in the DTE service area is any kind of reasonable expectation.

This kind of population and economic decline did not generally happen in the much greater area studied by ReliabilityFirst. Therefore, the assumption made on page 8-20 of the final EIS – that the Detroit Edison portion of the much larger area's electrical demand would be fairly constant – is clearly not justified. A more reasonable assumption would be that DTE's portion will continue to shrink.

In short, actual demand for electricity in Michigan is nowhere near what Detroit Edison, in their initial application to the Nuclear Regulatory Commission (NRC), said it would be. The MPSC was and remains wrong. The ReliabilityFirst study is not reliable for the DTE service area. The NRC would be wrong to accept DTE's poorly reasoned arguments on this point. Fermi III is not needed.

Yours,

Art Myatt
607 North Wilson
Royal Oak, Mi 48067