

**From:** [Mary M. Johnston](#)  
**To:** [Williams, Onika](#); [Spritzer, Ronald](#)  
**Subject:** Public Hearing Comments Fermi 3  
**Date:** Friday, November 01, 2013 11:32:40 PM  
**Attachments:** [Fermi 3 Attachment 1001.pdf](#)  
[Fermi 3 Attachment 2002.pdf](#)

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11/1/13

Administrative Judge Ronald M. Spritzer  
Atomic Safety and Licensing Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Public Hearing Comments Fermi 3

ASLB,

My name is Mary M. Johnston and I live at 25311 Harcourt, Farmington Hills, Michigan. My comments concern the proposed Fermi 3 nuclear reactor to be built next to the Fermi 2 site.

I am including 2 sets of comments one dated December 15, 2011 before the Nuclear Regulatory Commission in Monroe, Michigan and the other before the Atomic Safety and Licensing Board and dated March 31, 1982 also in Monroe, Michigan.

It is with great regret that I reread my comments of March 31, 1982 since it pretty much sums up critical issues that to this day have not been addressed by either the NRC or the ASLB. Basically nothing has changed except for the predictable and irreversible effects caused by nuclear accidents, and the consequent ecological destruction that makes a mockery of such things as safety and licensing hearings.

What more does this board need to see before the entire ecosystem falters and fails before the onslaught of this unforgiving technology? This is not a technical appeal but one based on our common humanity. It is in your hands that the fate of millions now rests. The burden of that responsibility is a heavy one and an unenviable one as well.

I urge you not to approve the license for Fermi 3 and to take into account the flaws of Fermi 2 that risks a Fukushima on the shores of Lake Erie. I can only say that the grave misgivings I expressed in 1982 have indeed come to pass and are, in fact, amplified by what is now the ongoing tragedy of the use of nuclear power for the generation of energy.

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# Safe Energy Coalition

17736 Five Points • Detroit, Michigan • (313) 531-8943

*"Better active today than radioactive tomorrow"*

MARCH 31, 1982


## FERMI II LICENSING HEARING

My name is Mary Johnston and I live at 25311 Harcourt, Farmington Hills, Michigan. I have been a member of the Detroit Safe Energy Coalition for the last 5 years during which time Fermi II has gone on in spite of all citizens' efforts to stop its construction.

The permission to operate this plant is already a foregone conclusion and this proceeding today is merely a necessary step toward that end. Such a fact can only breed cynicism about even entering into this hearing at all. However, there are some things that must be said for the record.

First and foremost is that the licensing process is open to question. If at all possible every effort is made to conduct these hearings quietly and almost invisibly--public input is neither sought nor valued. Reliance is excessively placed upon "credible" or "credentialed experts" thus creating<sup>A</sup> a special atmosphere so hermetically sealed that its conduct is unknown to the very citizens whose health and safety is at stake.

Therefore, knowing that every effort will be made to approve the license for Fermi II, the question must be asked "just what should people be expected to do in case of an accident similar to the one at Three Mile Island. At the time of that accident, Michigan's plans for evacuation were even less adequate than those in Pennsylvania according to Mr. James Keppler, Director of NRC'S Region III (which includes Michigan). In a study done by the Special Joint Committee on Nuclear Energy headed by State Senator Doug Ross and State Representative Mark Clodfelter - Michigan's plans for the evacuation of citizens living near nuclear power plants was found to be seriously inadequate.



The report stated that nearly 250,000 Michigan citizens live within 10 miles of one of the five sites at which these power plants are located. Nearly 8 million persons in Michigan Indiana Ohio and Ontario live within 50 miles of one or more of these sites approximately 5 million of them in Michigan.

The state plan relies heavily on the planning and capabilities of local units of government to deal with emergencies and it requires that local governments have plans containing specified elements. The question then becomes: "Is Monroe County ready and able to cope with a nuclear emergency"?

The head of Michigan's Department of Radiological Health, Donald Van Farowe has said that: "the federal government sent 400 people to Three Mile Island but they were very disorganized. There was a lot of milling around, and there was no coordinated effort". Could this happen in Michigan?

Why is it that here in Monroe, Michigan and in the surrounding ten mile Emergency Preparedness Zone (EPZ) no effort has been made to inform the public of just what to expect upon exposure to radiation? What public information is there about the results of a reactor accident or the nature of radioactivity? Since radiation cannot be perceived by the senses it presents a special category of risks which make it unusually difficult to deal with.

Where do people go and for how long? When can they return? Will the land be monitored for radioactivity levels? What about decontamination? Monitoring without decontamination means that large areas are watched but left unusable for long periods perhaps even years.

15 December, 2011

Environmental Impact Statement Public Comments

Re: NUREG 2105 Vol. 1

The Environmental Impact Statement prepared by the Nuclear Regulatory Commission of the United States is a document that is so biased in favor of DTE Energy that it cannot and must not be the basis for the issuance of a license. It does not in any way represent an independent assessment and, in fact, could have been written by DTE Energy.

To ask for public comments on this EIS when the conclusions are already established is intolerable and outrageous. Federal officials have stated that no environmental issues exist that would prevent construction of a new nuclear power plant near Newport, Michigan. That statement is beyond rational belief and is totally refuted by the facts themselves.

As far back as 1986 Harold Denton, director of NRC's Office of Nuclear Reactor Regulations (NRR), when speaking about the GE Mark 1 Boiling Water Reactor (the design of Fermi 2) told utility officials that: "the Mark 1 containments, especially being smaller with lower design pressure-and in spite of the suppression pool-if you look at the Wash (1400) reg safety study, you'll find something like a 90% probability of that containment failing."

To counter these doubts designers have come up with a new and untested design for Fermi 3. It is a GE-designed passive Economic Simplified Boiling Water Reactor (ESBWR). Its failures will be tested not on computers but on living populations.

Just one of the many lethal components in nuclear reactors is Uranium 238 (U-238) whose half-life is 4.5 billion years, which is also the age of the solar system. After its useful life in a reactor it is given for free to munitions manufacturers. U-238 is still highly radioactive and due to its density and penetrating power is now, unknown to most Americans, used by the U.S. military in what are actually radioactive weapons..

Locally, Monroe County has seen a 45.5% increase in cancer deaths for those from birth to 24 (according to the U.S. Centers for Disease Control and Prevention) since 1988 when Fermi 2 began operating. From 1979-1988 the cancer death rate among Monroe County residents under age 25 was 21.2% below the U. S. rate. In the early 1980s, the Monroe County cancer death rate was 36<sup>th</sup> highest of 83 Michigan counties, but by the early 2000s, it had moved up to 13<sup>th</sup> highest.

These heartbreaking statistics stand in sharp contrast to the rosy picture presented in this EIS. The sacrifice of our children in the service of a failed and failing industry, and the loss of their right to a livable world, is a moral failure of epic proportions.

Officials of DTE Energy who approve of this unconscionable devil's bargain, and profit from it, must be called to account. Site preparations must be stopped, injunctions put in place and investigations begun into the conclusions of this Environmental Impact Statement.

The environmental impact of accidents on populations worldwide are a continual indictment of nuclear power. Its destructive imprints are visible from space and are irreversible. To claim, as this EIS does, that no environmental issues exist is quite frankly preposterous. And it denies totally and factually the past history of this flawed and dangerous technology.

Windscale in England, the Urals Mountains in the former Soviet Union, the devastation of Chernobyl, Three Mile Island in the U. S. and Fukushima in Japan are warnings that are ignored at great peril to all life. How much more can the Earth withstand before its ecosystems falter and fail entirely?

(OVER)

Fermi 3 will contain within its core the capacity to render not just this area but many thousands of miles beyond the State of Michigan unlivable and uninhabitable. Within the 2 emergency planning zones 92,377 live within 10 miles and 4,799,526 live within 50 miles. The city center of Detroit is only 30 miles away. Evacuation is impossible with such numbers.

The best scientific minds of the 20<sup>th</sup> century discovered a fission process that combines some of the most poisonous elements on Earth in order to produce electrical energy. Consequently, a nuclear reactor's coolant must constantly bathe the core to prevent a serious accident that could result in the burning through of the containment, as we are witnessing today in Fukushima, Japan. Fukushima's radioactivity has been detected in fruits, vegetables and milk in the United States. And even without a catastrophic accident, the deadly products of normal operation cannot be disposed of in any ordinary way, but are instead being dispersed around the Earth. No safe burial is to be found anywhere. The wastes of The Manhattan Project, produced more than a half century ago, await a final disposition. This EIS assumes that there is such a place but, unfortunately, that dream is not to be, now or ever..

Meanwhile, the Great Lakes are daily assaulted and endangered by radioactive releases legally allowed under federal rules permitting them. Our Lakes were never meant to bear the burden that constantly pollutes its waters. The life sustaining capacities of 20% of the Earth's fresh water are precious resources beyond any attempt at cost/benefit analysis. They oppose, by their very existence, the life destroyers that are in all the Fermis of the world. We need look no further than the near meltdown at Fermi 1 documented in the book *We Almost Lost Detroit* to see the dangers completely unmentioned in this EIS. Fermi 1 remains as a decaying monument to human folly and to the arrogance of the nuclear establishment. A section of this EIS even lavishes praise (p.4-97) on its possible designation as an historic site on the National Register of Historic Places (NRHP). If the NRHP does do this unthinkable act they should also warn potential visitors to wear dosimeter badges.

When Fermi2 went online it began a process that cannot be reversed. Water is incapable of removing its lethality. Earth cannot contain its poisons. And, ultimately, everything it touches it destroys. The reactor core itself is shielded by what is rightfully called a shroud whose protective coverings must withstand an accident of unimaginable force and destruction. The release of its poisoned contents could kill all within striking distance and permanently injure those beyond.

This EIS is shamefully dismissive of any dangers to the Earth that nuclear power represents. Its assessments are flawed and its conclusions unacceptable as an independent review of the impact of Fermi 3 on the environment.

It is crucial that local, state and federal representatives halt this process immediately. They must call to account DTE Energy and the NRC. This document represents their joint efforts to minimize the threats to public health and the environment that exist in the real world, in order to grant an operating license to DTE Energy. It is in light of these life threatening imperatives that these comments are submitted on behalf of our children, and all future generations, who deserve to inherit a clean, sustainable and unpolluted Earth.

Mary M. Johnston

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**From:** [Mary M. Johnston](#)  
**To:** [Williams, Onika](#); [Spritzer, Ronald](#)  
**Subject:** Addendum to Public Hearings Comments Fermi 3  
**Date:** Saturday, November 02, 2013 12:24:19 AM  
**Attachments:** [Fermi 3 Attachment 2002 Addendum.pdf](#)

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There is no emergency response beyond 50 miles from a plant even though studies have shown damage to human health could occur more than 150 miles away. According to Ross and Clodfelter the Emergency Preparedness Zones are so arbitrarily set that they could leave thousands of people unprotected. For instance, the southern-most portion of Wayne County approximately south of the southern tip of Grosse Ile although it lies well within ten miles from the Fermi 2 plant northeast of Monroe is not included in the primary EPZ for the plant. As many as 10,000 people may live in this part of Wayne County.

Also, the state and local plans make no definite provision for the distribution of potassium iodide tablets to persons who might be exposed to radiation in an accident. The value of these tablets in preventing damage to the thyroid from radioactive iodine <sup>HAS</sup> ~~have~~ been well documented. Radioactive iodine is one of the most dangerous substances that would be released in a serious reactor accident in part because it tends to concentrate in one organ the thyroid. Children are especially <sup>SUSCEPTIBLE</sup> <sub>n</sub> to injury. The cost of providing potassium iodide would be minimal.

To those who say that "nothing happened" at the Three Mile Island Nuclear Power Plant we can only point out these disquieting facts. There was design failure, equipment failure public information failure evacuation procedures failure human error governmental regulation failure and safety system failure. In fact, redundant safety systems failed redundantly. The fact remains that a nuclear reactor with 100 tons of uranium packed in fuel rods in its core came within 30 to 60 minutes of a core meltdown. And according to the Kemeny Report the accident did not end with cold shutdown. More than 700,000 gallons of radioactive water remain inside the containment building or store in auxiliary building tanks. The containment building also holds radioactive gases and the badly damaged and highly radioactive core. Radioactive elements contaminate the walls floors and equipment of several buildings. Ahead lies a decontamination effort un-



precedented in the history of the nation's nuclear power industry--a cleanup that could take as long as nine years to complete. All that in addition to the \$2 billion cost of additional purchased power and the 1 billion dollar cost of the plant itself. The owners of TMI General Public Utilities now hover~~d~~ on the brink of financial ruin. Utility <sup>RATES</sup> have risen 64% and a government bailout may be required to save the utility. Under the circumstances it is not comforting to know that the President's Commission Report on Three Mile Island (Kemeny Report finding #12 p. 56) reads: With its present organization staff and attitudes the NRC is unable to fulfill its responsibility for providing an acceptable level of safety for nuclear power plants.

The trade offs being made between energy production needs and human and other casualties represent a cynical cost/benefit analysis that would be more acceptable in a totalitarian system. Nuclear power is highly centralized and decisions are made and carried out by unelected officials whose responsibility to a concerned citizenry is non-existent. Such policy decisions are is antithetical to democratic decision making and reduce citizens to the role of onlookers and non-participants in the affairs of government. But, we, the citizens of Michigan, believe that it is not only our right but our responsibility to see that the state protects the health and welfare of its people. We are here today to exercise that right and that responsibility.

**From:** [Williams, Onika](#)  
**To:** [Docket, Hearing](#)  
**Subject:** Johnston Email and Attachments (Fermi)  
**Date:** Monday, November 04, 2013 9:51:17 AM  
**Attachments:** [Johnston Email and Attachments \(Fermi\).pdf](#)  
[image001.png](#)

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May we have this statement placed in Fermi's Limited Appearance Statement folder?

Thank you,

Onika

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