

## TurkeyPointCEm Resource

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**From:** Mara Shlackman [marashl@hotmail.com]  
**Sent:** Friday, May 22, 2015 8:07 AM  
**To:** TurkeyPointCOLEIS Resource  
**Subject:** Comments on DEIS for Turkey Point Units 6 & 7 Combined License Application

I am a lifelong resident of south Florida, and my childhood was spent in the Homestead vicinity. I oppose the application for Units 6 and 7 at Turkey Point. While it was an ill-advised decision over 40 years ago to locate two nuclear reactors between two national parks, Everglades National Park and Biscayne National Park, which are unique biodiversity hotspots, that decision should not be compounded by adding two additional reactors to the site.

FPL has failed to adequately account for the intersecting impacts of sea level rise and storm surge. A study by John Perkins and Natalie Kopytko published in the journal Energy Policy in January 2011 concerning 9 coastal nuclear reactors in the US found that while currently operating nuclear plants were built high enough to withstand sea level rise alone for the next 50 years, which is beyond the operating lifetime of those plants, storm surges from Category 4 and 5 hurricanes will completely inundate those plants within their lifetimes -- see <http://www.climatecentral.org/news/sea-level-rise-brings-added-risks-to-coastal-nuclear-plants>

The aforementioned article from Climate Central pointed out the deficiencies in FPL's projections concerning sea level rise and storm surges for its application for Units 6 and 7:

During its [safety assessment](#) for the new reactors' applications at Turkey Point, FPL has modeled a worst-case scenario, based on what they estimate to be the highest tide conditions paired with the worst potential hurricane to strike the area — plus an additional 10 percent for an extra margin of safety. Based on these estimates, FPL predicts the maximum storm surge at the location of the new Turkey Point reactors would likely be no higher than 24.8 feet, which is 1.2 feet below the plant's safety facilities.

In particular, these calculations of a likely maximum storm surge include an estimate that sea level could rise by between 0.78 and 1 foot in Biscayne Bay during the next century. This rate of sea level rise was based on observations taken at a nearby NOAA tide gauge between the years 1931 and 1981 and then extrapolated forward. Scientists, however, have observed that in recent decades the rate of sea level rise has been accelerating. According to a Climate Central analysis of sea level rise in the same region, but based on readings for the most recent 30-year period, the rate of sea level rise around Turkey Point is already about 15 percent higher, or about 1.1 feet-per-century, than what FPL used in its assessment. Consequently, FPL's assessment that Turkey Point can withstand a worst-case scenario storm might fall short.

There is already a growing consensus among scientists that the rate of sea level rise is higher than the IPCC estimated in their 2007 report. For example, a [2010 report from the National Academy of Sciences](#) confirmed that the future rate of sea level rise may actually be higher than that projected by the 2007 IPCC assessment, because that report didn't take into account future ice losses from Greenland and Antarctica. Consequently, FPL has likely failed to account for how much sea level will rise at Turkey Point in the next 100 years. Because these rates of sea level rise are included in the calculations of how large storm surges could be at Turkey Point, FPL may also be underestimating their "worst-case scenario."

There are already thousands of pounds of spent nuclear fuel rods accumulating onsite at Turkey Point, and that accumulation will be compounded by the addition of two reactor units. Given the half-lives of Uranium 235 and plutonium, this waste will remain radioactive for thousands of years, and yet it is accumulating in a location vulnerable to sea level rise and storm surges, whose impacts FPL has underestimated. The spent

fuel rods greatly multiply the risks from adding two reactors at this location, to the human population and even more so the wildlife in the nearby national parks.

A more immediate impact on wildlife that will result from construction of Units 6 and 7 arises from the powerlines that will be built through Everglades National Park to transmit the power from the reactors. I have observed one of the wood stork colonies in Everglades National Park that is in close proximity to the location where the powerlines and their supporting towers will be installed - there are three federally threatened wood stork colonies known to roost in the vicinity. The powerlines will increase electrocutions and collisions for wood storks and other birds. It is well known that the wading bird population in the Everglades has already declined 90% over several decades; this loss should not be compounded with powerline infrastructure. This infrastructure will also mar the view for visitors who come from all over the world to this UNESCO World Heritage site.

The impacts mentioned above are by no means the only adverse impacts from the addition of two new nuclear reactor units. I hope the NRC will take my comments into consideration and reject FPL's application.

Sincerely,

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