

PUBLIC SUBMISSION

As of: 5/27/15 12:27 PM
Received: May 22, 2015
Status: Pending_Post
Tracking No. 1jz-8izt-dnrr
Comments Due: May 22, 2015
Submission Type: Web

Docket: NRC-2009-0337

Notice of Receipt and Availability of Application for a Combined License

Comment On: NRC-2009-0337-0020

Combined License Application for Turkey Point Nuclear Plant, Unit Nos. 6 and 7; Draft Environmental Impact Statement

Document: NRC-2009-0337-DRAFT-0194

Comment on FR Doc # 2015-05099

*3/5/2015
80 FR 12043*

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2015 MAY 27 PM 12:39

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General Comment

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The question of whether nuclear power is good or bad is not the main issue here. Rather, the issue is whether this project in this particular location should be allowed to go forward. We think it should not. Here's why:

1. Two of Florida's most important public lands and wildlife habitats - Biscayne and Everglades National Parks - will be put at risk and be forever changed by a project of this scale.
2. The powerful new reactors (1,117 MW each) are to be cooled primarily by 90 million gallons per day of recycled Miami-Dade County sewage and wastewater. This water will not be pure H2O - and some will be released over Biscayne Bay and surrounding wetlands along with steam in the planned cooling towers. Aerosol droplets known as "drift" can travel far and contain pharmaceuticals, cleaners, detergents and other household chemicals, as well as viruses and bacteria (which can grow inside the cooling towers themselves as bacterial slime). Impacts are largely unknown.
3. In 1992, the two existing nuclear reactors at Turkey Point took a direct hit from Hurricane Andrew. According to the NRC's own report: "The onsite damage included loss of all offsite

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power for more than 5 days, complete loss of communication systems, closing of the access road, and damage to the fire protection and security systems and warehouse facilities...the high water tank collapsed onto the fire water system, rendering the fire protection system inoperable. In addition, the storm threatened safety-related equipment (e.g., potential collapse of the damaged Unit 1 chimney onto the diesel generator building)." In other words - South Florida dodged a very big bullet in 1992.

4. The low-lying wetlands which surround Turkey Point contain some of the lowest elevations in South Florida. Even a half foot of sea level rise will be enough to inundate the 5,000 acres of canals used to cool the two reactors currently operating at this location. They are filled with hot and extremely salty water - as well as chemicals used to kill a recent algae outbreak in the canals. With scientists measuring ever-increasing sea level rise from the melting of our planet's remaining ice in addition to thermal expansion due to increased temperatures, those 6 inches of sea level rise are a virtual certainty.

5. Already thousands of pounds of spent fuel rods (nuclear waste) have already piled up on the shores of Biscayne Bay. There is no long term safe storage on the horizon. With the two new reactors having a much larger power capacity than the existing ones, increasing amounts of spent nuclear fuel containing uranium-235, plutonium, and other dangerous radioactive materials will be accumulating in storm areas. The tragedy of Fukushima should have been the last word on building nuclear plants.

6. Included in the project application are three new sets of powerlines (two of them will be 15 stories tall) to be run across and through the eastern section of what is currently Everglades National Park. Expected impacts include: increased electrocutions and collisions for birds (three federally threatened wood stork colonies are known to roost in the vicinity of the proposed lines); the spread of invasive plant species along a new, driveable access corridor; changes to the hydrology of the Shark River Slough (the "crown jewel" of Everglades restoration) due to tower pads and road construction; and a new, unsightly, industrial landscape - visible for miles - for visitors to one of our country's most unique and popular wilderness areas.

When the first two nuclear reactors and fossil fuel plants were completed at Turkey Point, regulators failed to consider the impacts of dumping hot water (used for cooling the generators) directly into Biscayne Bay. When the 5,000 acres of cooling canals - likely the largest radiator on the planet (and clearly visible from space) - were carved out of natural mangrove habitat to correct the problem, regulators again failed to consider that the extremely hot salty water would drop through the surrounding limestone and degrade the underlying Biscayne Aquifer. The known risks from this project are bad enough - very hard to plan for the unknown and unconsidered risks as well as inevitable human error.

This investment of more than 20 billion dollars makes no logical sense. Solar power was not considered a viable alternative by the NRC reviewers - even though no state in the eastern half of the U.S. has the solar potential of Florida - also known as the Sunshine State. FPL should drop this risky project and instead embrace a solar alternative that the company knows its customers want. Solar contains virtually none of the risk of its proposed Turkey Point expansion and will contribute to both the ecological and economic sustainability of our region for years to come.