

Gallagher, Carol

From: Jessie Collins <jessiepauline@gmail.com>
Sent: Monday, January 04, 2016 7:34 AM
To: Keegan, Elaine
Cc: fiasco-three-prevention@lists.riseup.net
Subject: [External_Sender] NUREG 1437 Corrected Comments
Attachments: Comments on NUREG 1437.pdf

Dear Ms. Keegan,

It was brought to my attention that I entered a wrong NUREG number in my previously submitted comments. Therefore, I have corrected the number, and saved in pdf, since that is the NRC preference.

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Jessie Pauline Collins

11/6/2015
80 FR 68881

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RULES AND PROCEDURES
SUNSI
1/4/2016

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM -03
Add= E. Keegan (enk)

**CRAFT Comments to the Nuclear Regulatory Commission
Regarding their Recommendation to Extend the Fermi 2 Reactor License
For an Additional 20 Years**

28 Dec. 2015

Elaine Keegan, NRC

Dear Ms. Keegan:

Citizens' Resistance at Fermi Two (CRAFT) objects to the NRC's decision to recommend the 20-year license extension for the Fermi 2 nuclear reactor in Monroe, MI. We object to the following statements in NUREG 1437, Supplement 56:

Line 229-30: "Neither DTE nor the NRC identified information that is both new and significant related to Category 1 issues that would call into question the conclusions in the GEIS." *(During the scoping process, intervenors identified plenty of issues, and we were granted a promise of a public hearing on a few of those issues. After a year, the NRC decided not to bother with the public and threw out our promised hearing.)*

Lines 42-43, "The plant's NPDES permit does not impose any thermal effluents limits, such as either a maximum temperature or a change in receiving water temperatures per unit of time." *(The NRC acknowledges the crime, but pleads innocent because it's not their department.)*

Page 3-9, water usage. Lines 8-10, "Consequently, with four GSW (general service water) pumps operating, Fermi 2 withdraws approximately 30,800 gpm or about 44.4 million gallons per day of water from Lake Erie." *(We consider it a crime against nature for DTE to remove 44.4 million gallons of cold water from Lake Erie each day, and then discharge it back heated.)*

Page 3-10, Potable water. Lines 36-37, "Fermi's potable demand is approximately 20,000 gallons per day, or about 14 gpm." *(That's a lot of water usage for flushing toilets, but then with the porta-pottys being blown over every six months, WE guess the workers need it.)*

Table ES-1, Cumulative Impacts: Water Resources, Small to Moderate; Terrestrial Ecology, Moderate to Large *(We object on behalf of all our relations - the land does not need any more damage);* Aquatic Resources, Large *(It's hard to believe that the NRC admitted the impacts on water life would be large, when the world knows the water can't take much more poison);* Global Climate Change, Moderate. *(Moderate? Has the NRC not been promoting nukes as carbon free?)*

Severe Accident Mitigation Alternatives: Lines 7-8, "SAMAs are potential ways to reduce the risk or potential impacts of uncommon, but potentially severe accidents." Lines 11-14, "Because the potential cost-beneficial SAMAs are associated with procedure changes, new hardware to improve a manual action, and a new structure between switchgear rooms, the NRC staff determined that these SAMAs do not relate to managing the effects of aging during the period of extended operation." *(How is it possible that Severe Accidents wouldn't be increased by operating an aged reactor? How can the NRC state that any improvements toward safety are not cost effective? Was all the taxpayers' money the NRC spent studying "Lessons Learned from the Fukushima" disaster merely another waste?)*

Page xxiv: Alternatives to License Extension: Lines 6-11, "The NRC staff considered the following feasible and commercially viable replacement power alternatives; Natural gas combined-Cycle (NGCC); Coal-integrated gasification combined-cycle (IGCC); New Nuclear Power* (*not Fermi 3); and a combination of NGCC, wind, and solar power." *(Who decided upon those off-the-wall alternatives when REAL alternatives were available? Was the new nukes put in as a scare tactic to make the public relieved that the existing reactor would run another 35 years?)*

NRC rejections: Lines 10-32, "The NRC staff considered the following alternatives, but dismissed them: energy conservation and energy efficiency; solar power; wind power; biomass; hydroelectric power; wave and ocean energy; fuel cells; delayed retirement; geothermal power; municipal solid waste; petroleum-fired power; supercritical pulverized coal; and purchased power." *(Most of these options were actually feasible, and at a cheaper rate than building a Fermi 3 for sure!)*

Page 1-6, lines 22-26: "There are also decisions outside the regulatory scope of license renewal that cannot be made on the basis of the GEIS analysis. These decisions include the following issues: (1) changes to plant cooling systems, (2) disposition of spent nuclear fuel, (3) emergency preparedness, (4) safeguards and security, (5) need for power, (6) seismicity and flooding." *(Are these exceptions greater than the rule? If the NRC doesn't have regulatory scope of the disposition of spent fuel, who does? Studies have proven Michigan electricity generation has been in yearly decline since 2005.)*

Page 1-7. Related State and Federal Activities, line 36. "There are 11 Federal and 110 State-managed lands with 50 miles of Fermi 2, which includes 5 Federal and 60 state-managed lands in Ohio...10 Canadian provincial lands are located within 50 miles of Fermi 2, including a portion of the Walpole Island First Nation Reserve." *(Many of the parks have families enjoying life without the knowledge their loved ones could become contaminated by radiation.)*

Page 1-8. Lines 12-13, “Accordingly, the NRC invited the tribe (Walpole Island First Nation) to provide input on the Fermi 2 license renewal environmental review process.” *(That’s news to us since the NRC failure to do so was one of the contentions CRAFT was granted a hearing on!)*

Page 2-2. Lines 21-23, “DTE did not identify the need to undertake any major refurbishment or replacement activities associated with license renewal to support the continued operation of Fermi 2 beyond the end of the existing operating license.” *(Is that decision left to DTE on whether they should invest money in safety issues? Weren’t several recommendations made for safety at Mark Is from the Lessons Learned?)*

Page 2-13, Solar Photovoltaic, lines 40-44, “Under a program begun in 2009, DTE obtains easement rights to locate large solar arrays on suitable property in southeastern Michigan, and it has allocated 15 MW for this program. As of 2014, 20 projects totaling approximately 8.2 MW of solar PV capacity had been installed in the ROI, and 3 other projects representing 5.2 MW were in the construction, design, or feasibility stages.” *(DTE obviously knows it must go to sustainable energy sources eventually, so why not develop these projects now and save us all headaches?)*

Page 2-21. Lines 33-34, “In conclusion, the environmentally preferred alternative is the granting of a renewed license for Fermi 2.” *(WE object to the very thought that running Fermi 2 another 35 years is environmentally preferred.)*

Page 3-11, Radioactive Waste Management. Lines 14-15, “All nuclear plants were licensed with the expectation that they would release radioactive material to both the air and water during normal operations.” *(However, when that expectation was established, the full effect of radiation was not known. It is known now, and so only NO release to the atmosphere is acceptable.)*

Lines 28-30, “the radioactive material removed from the effluents is either released into the environment or converted into a solid form for disposal at a licensed radioactive disposal facility.” *(We repeat, radioactive material should never be released into the environment.)*

Lines 42-45, Radioactive Liquid Waste Management, “The liquid radioactive waste system at Fermi 2 collects, monitors, processes, stores, and returns radioactive liquid wastes to the plant for reuse or to the CWR blowdown line for controlled discharge.” *(See previous comment)*

Page 3-14, Radioactive Gas, lines 4-5, “Gaseous radioactive wastes are released into the atmosphere in a controlled and monitored manner.” *(See previous comment)*

Lines 31-32. “The Fermi 2 solid radioactive waste system has a portable solidification and dewatering system supplied and operated by a vendor.” *(Is the vendor accountable to the NRC or are they like the transmission company that is outside the rules?)*

So, for the sake of brevity, CRAFT objects to the whole process that endangers us unnecessarily when alternative sources of energy are available now.

Sincerely,

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