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Gallagher, Carol

From: susan susan <sunlightrising@gmail.com>
Sent: Monday, January 04, 2016 12:41 PM
To: Keegan, Elaine; Danna, James; Carol.Gallagher@nrc.gov
Subject: [External_Sender] Re Fermi 2 license renewal extension (another 20 years) comments

To Whom It May Concern:

I strongly object to the Fermi 2 license renewal extension, given all the safety problems that exist there such an extension is irresponsible and unsafe. The Intervenor's of the scoping process have identified more than sufficient issues in order to warrant closing Fermi 2, but there has not been the public hearing pertaining to some of those issues which is clearly warranted, which further cements the need to close Fermi 2. If the owners of Fermi 2 were seriously interested in an license renewal extension, then they should have sufficiently interested in cooperating with the public and addressing those concerns and ensuring that the NRC conducted the hearing on the issues that it said it planned to do.

Fermi 2's NPDES permit is unacceptable without the required imposition of thermal effluent limits, such as a "maximum temperature or a change in receiving water temperatures per unit of time." The NRC agrees that this crime is present. To whom has the NRC referred it to as the authorities that can regulate this acknowledged crime? Certainly, NRC has an obligation to ensure safety of Fermi 2 in terms of temperatures of effluents as part of the technical criteria upon which the entire reactor depends to generate electricity.

Fermi 2 has 4 General Service Water pumps withdrawing about 44.4 million gallons per day of water from Lake Erie.
gallons per day of water from Lake Erie. It is unacceptable for Fermi 2 to remove 44.4 million gallons of cold water from Lake Erie daily, and then discharge it back heated. This violates protections under the Great Lakes Water Quality Act and other legal protections pertaining to environmental issues, aquatic resources, and Great Lakes water issues. These require immediate compliance.

In Table ES-1, Cumulative Impacts: Water Resources, Small to Moderate: It is unacceptable to continue to degrade and destroy water resources in the Great Lakes because it is the drinking water for 40 million people and affects others adversely in different ways.

Terrestrial Ecology, Moderate to Large: It is unacceptable to have moderate to large cumulative impacts on terrestrial ecosystems which are required not only for endangered species and other wildlife to survive but also for human survival.

Aquatic Resources, Large. NRC correctly acknowledges that the impacts on water life will be "large," and NRC should be aware that the Great Lakes are an irreplaceable global treasure of high quality drinking water with valuable aquatic resources.

Global Climate Change, Moderate. The NRC should be aware that the impact of nuclear power from cradle to grave (with the grave section most conservatively estimated with serious deficits in cost calculations for isolating waste for ten thousand to billions of years into the future) falls just slightly under the global climate change impact of fossil fuels, but way above the impact of all forms of

sustainable renewable energy sources, including wind and solar. The nuclear power impact upon global climate change ranges in the lower part of the upper end of impacts just under the impact of fossil fuels. Nuclear power is not a viable source to address the severity of global climate change that is occurring with billions of dollars in damage to the USA as well as to other parts of the world. Global climate change is here and may have already went past the irreversible stage, but we can only speed our solutions as quickly as possible to hope that we can mitigate the worst of it. New nuclear power can not sufficiently address the speed to which that must occur. Extending existing nuclear power reactors with ongoing safety problems that are harming the environment in so many ways is not a viable option, not an economic option, not a safe option. Failure to manage the complete effects of aging reactors is not a sufficient way to reduce to risk of potential impacts of potentially severe accidents. The word "uncommon" risk introduces confusion because the nuclear experts now are predicting this "uncommon" risk every 15 years, but that does not alter the dire effects of rending large amounts of land unsuitable for human habitation for thousands of years at best when we have an increasing world population that is overcrowding the planet. It is irrational to call this an "uncommon" risk when the consequences are predictable and severe and unacceptable. It is unprofessional to twist language and alter perceptions of reality in this way.

These are more than sufficient reasons to not extend the Fermi 2 license into the future beyond the time that it was previously stated was its safe lifetime when the license was originally granted, particularly in the fact that Fermi 2 continues to have serious problems apparently with maintenance, human culture, and unreliable or untimely technological fixes. Fermi 2 does not deserve an extension because it is threatening excessive amount of critical natural resources and the lives and quality of life of the people and wildlife who depend upon those critical natural resources being free from nuclear radiological poisons that will damage their genetic reproduction into the future as well as their health in the future.

Respectfully submitted
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Monday, Jan. 4, 2016