As of: 1/6/16 1:05 PM
Received: December 20, 2015
Status: Pending_Post
Tracking No. 1jz-8mxd-d2db
Comments Due: December 28, 2015
Submission Type: Web

PUBLIC SUBMISSION

11/6/2015
80FR 68881

Docket: NRC-2014-0109
License Renewal Application; Fermi 2

Comment On: NRC-2014-0109-0033
DTE Electric Company; Fermi 2 Nuclear Power Plant; Issuance of Draft Environmental Impact Statement

Document: NRC-2014-0109-DRAFT-0046
Comment on FR Doc # 2015-28265

34

Submitter Information

Name: Anonymous Anonymous

General Comment

According to a 2014 document filed by the Alliance to Halt Fermi 3, which also opposes the renewal of licensing for Fermi 2:

1. The GE Mark 1 Boiling Water Reactor (BWR), of which Fermi 2 is one example, has serious design flaws which give a high probability of catastrophic failure.

2. Actual demand for electricity in Michigan has declined, not grown, since 2007. Michigan does not need electricity from Fermi 2 or from the proposed Fermi 3 reactor.

3. Emergency planning for regional evacuation is completely inadequate. A 50-mile evacuation zone should be the basis of planning, as evidenced by NRC evaluation of the Fukushima disaster.

4. Fermi 2's effects on public health have been demonstrably and significantly negative. Cancer rates, cancer deaths and mortality from other illnesses have increased in regions around nuclear reactors generally and in the region around Fermi 2 specifically.

5. Thermal discharges from Fermi 2 into Lake Erie have contributed to creation of public health emergencies with municipal drinking water. Lake Erie's shallow western basin has proven much less able to handle thermal discharges than was anticipated when Fermi 2 was initially approved.

6. Radiation protection standards by which Fermi 2 has been evaluated are in fact inadequate to protect children.

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

7. The severe accident analysis for Fermi 2's spent fuel pool is simply wrong. Potential accidents originating from the spent fuel pool actually have severe consequences. This is one of the design flaws of GE Mark 1 BWRs.

8. There numerous endangered species in and near to the Fermi 2 site, for which no analysis of the effects of Fermi 2's operation has been done.

9. The lessons of the Fukushima nuclear disaster (according to the NRC task force on this issue) have not been applied to Fermi 2, and there are no plans to apply those lessons.

10. Numerous Native American/First Nations communities have treaty rights affected by the continued operation of Fermi 2, but the effects of Fermi 2 on these communities has not been evaluated and the legal standing of some of these communities is not recognized by the NRC.

The Atomic Energy Act (AEA) precludes the U.S. NRC from licensing any new nuclear power plant or relicensing
any existing nuclear power plant if it would be "inimical . . . to the health and safety of the
public." 42 U.S.C. 2133(d).

The Alliance To Halt Fermi-3 (ATHF3) unconditionally opposes the relicensing of Fermi, Unit 2 and expects the following standards to be met regardless, with the ultimate goal of shutting down and decommissioning the
nuclear reactor as soon as possible:

1) Heightened security to protect against attack from the air, water, and land.
2) Safer storage of spent fuel until all spent fuel is moved offsite; this entails reducing the spent fuel pool to its
original low-density, open-frame design and placing the bulk of the spent fuel in hardened dry casks (Hardened
On-Site Storage -- HOSS).
3) Reduction of allowable radioactive emissions/releases into the environment.
4) Monitors ---- real-time air monitors installed offsite in sufficient numbers linked by computer to the State with regular public reports; enhanced environmental monitoring by the State with regular public reports.
5) Replacement of the water cooling system with one not harmful to Lake Erie's fragile ecosystem.
6) Updated, post-Fukushima Emergency Planning, including expanding the Emergency Planning Zone (EPZ).
7) Installation of a hardened, filtered vent in order to address the well-known and unresolved design vulnerability of the GE Mark 1 BWR pressure suppression containment system.
8) Conformance and compliance with all technical specifications required for new reactors.
9) The NRC must follow and enforce its own regulations and become a more effective regulator to protect people and the environment --- Severe Accident consideration of spent fuel pools is a prime example.
10) Independent reevaluation and audit of the need for continued electric power generation from Fermi, Unit 2
in the first place.