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NUREG-1437 Supplement 56, draft

Attention Ms. Keegan:

This document is being sent to you as part of the discussion with regard to the renewal of the Fermi 2 license. The earlier discussion took place on December 2. I was one of the people who commented at that point. Some of the discussion here goes beyond what was said back then. I will point out what I consider to be problem areas in the plan to go ahead and grant a further 20 years of license for this facility. The major area that I am having trouble regarding the extension of this renewal of has to do with costs as they relate to value received.

We have the costs connected to energy and on the other hand we have the current aging nuclear plant. What is proposed in the license renewal seems to have at least two parts. The proposal seems to disregard the possibility that an older plant might well involve repairs at some point as well, plus fails to make available any other options should the plant be down while requiring repairs. It does it in the context of falling costs on the renewable energy side and expanding costs on the nuclear side. Also, there is the possibility of expensive repairs, especially with regard to the fact that it is after all an aging reactor.

The historical context makes it that much worse. Several months ago, looking for some articles to share with friends of mine, I noted that suddenly there were all kinds of articles on the carbon tax. These were articles that were carried in first ranking publications, such as the New York Times and the like, much of it directly about the carbon tax, which a short while before that they were carrying practically nothing on the carbon tax. Now, the Chair Person of the International Monetary Fund has come out to say plainly that now is excellent time to enact the Carbon Tax. The reasons this is even important is that it bears on the possibilities of repairs of either or both reactors. Costs of anything, even repairs are variable according to general conditions, including but not limited to prices.

Initial criticality for Fermi II was achieved in July 1985. That was 30 years ago. At the end of the present lease it will be essentially 50 years old. CEO Anthony Earley said in 2009 that DTE's analysis "so far shows that nuclear power will, over the long term, be the most cost-effective baseload option for our

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customers, ... We expect nuclear to remain the low-cost option, but we will continue to evaluate nuclear against other resources and will commit to proceeding with construction only at the right time and at the right cost". Will this still be feasible, under the circumstances noted above?

And in 2009, there was a further development: a coalition of citizen groups asked federal regulators to reject plans for Fermi 3, contending that it would pose a range of threats to public health and the environment. The groups have filed 14 contentions with the Nuclear Regulatory Commission, claiming that a new plant would pose "radioactive, toxic and thermal impacts on Lake Erie's vulnerable western basin." (Fermi 3 opposition takes legal action to block new nuclear reactor)http://www.freep.com/story/news/2015/04/30/fermi3-nukeplant-approved/26659891/

Bill Dedman, "What are the odds? US nuke plants ranked by quake risk," msnbc.com, March 17, 2011 http://www.msnbc.msn.com/id/42103936/ Accessed April 19, 2011 .

https://en.wikipedia.org/wiki/Enrico Fermi Nuclear Generating Station

In general, I see several problems here: what will be the long term repair record for Fermi 2 or 3 or both and how will that impact costs over time?

What, then will be the situation of a City with long lasting vulnerabilities over extended times when the load of costly reactors may persist?

Is there a way that Nuclear power may not even be considered a smart move? And a way out if that takes place?

Sincerely,

Maker &

Robert E. Wicke