



Illinois Dunesland Preservation Society

Protecting the Nation's First State Dedicated Nature Preserve

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December 22, 2015

John B. Hickman
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555-0001

**Subject: Formalized comments involving our attendance at the Tuesday, December 1, 2015 Public Meeting (ML15320A423) regarding the release of a portion of the property at the Zion Nuclear Power Station site :
Docket Numbers – Facility names 05000295 Zion 1 & 05000304 Zion 2**

Dear Mr. Hickman,

Submitting our formalized comments, I represent the Illinois Dunesland Preservation Society, which is a 65+ year old environmental organization that co-founded Illinois Beach State Park. These are preliminary comments; further comments will be submitted before the December 24, 2015 deadline.

Unfortunately, the Zion Nuclear Power Station is located in the middle of the park on its shoreline. The nuclear station has apparently caused significant erosion to the park to the south of the station and has impacted the nation's state dedicated nature preserve.

- It is imperative that serious consideration be given to a HOSS (Hardened Onsite Storage). Current modules or cylinders have been placed on a concrete pad and sit like bowling pins on the Illinois shoreline, exposed to potential terrorism by aircraft and explosives in those aircraft. If the modules are breached, it would be calamitous for the nuclear material to contaminate Lake Michigan, the source of drinking water for at least 20,000,000 people.
 - We request that the NRC contact Homeland Security and thoroughly review this problem with technical review by engineering outside the NRC.
 - The computer model testing of the modules is grossly insufficient.
 - The *in situ* physical testing and its depth of study is also lacking and insufficient.
- The park and its coastal zone was recently given RAMSAR status, one of thirty-six in the United States of a total of more than four hundred globally.

- **There are two pipes extending from the nuclear station hundreds of feet into the water.**
 - **This is considered a coastal structure and apparently has caused significant, negative impact to the park's southern shoreline and should be removed.**
 - **The piping/structure extending into Lake Michigan is an apparent violation of an Army Corps of Engineers' permit.**
 - **The piping and NPDES permit are under the jurisdiction of the Illinois Environmental Protection Agency, which appears to be in violation.**
- **The pipes are privately owned and are an apparent violation of the Public Trust Doctrine of the State of Illinois since it is no longer a nuclear power station.**
 - **These pipes should be removed immediately because it is privately owned.**
 - **Exelon and Commonwealth Edison and all the other entities involved in operating/demolishing the power station and its deregulation have a responsibility to repair the damage that was apparently created by the power station's pipes.**
- **The park's entire shoreline is a federal, critical habitat for the piping plover. Much of this habitat has been destroyed in an apparent violation of the regulations and statutes of the U. S. Fish and Wildlife Service.**
 - **Illinois Beach State Park is under the U. S. Department of Interior's National Natural Landmarks program (NNL), which has regulations and statutes for protecting this type of habitat.**
- **The park has scores of ancient, Native American archaeological sites, which fall under federal jurisdiction.**
- **The NRC must take jurisdiction and act on these problems before any other actions are taken in this matter.**
- **The property that is available should be given to the State of Illinois for Illinois Beach State Park to form a complete nature preserve, connecting the north and south units of the park.**

Illinois Dunesland Preservation Society is currently exploring possible legal remedies to rectify the inaction by the agencies and entities involved.

Sincerely,

Paul A. Kakuris

Paul A. Kakuris, President