

ClinchRiverESPEISCEm Resource

From: Lynne Roberson <lmroberson@aol.com>
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This is my home. Please read the attached comments.

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Public Comment on Draft EIS—Clinch River ESP. Docket ID NRC-2016-0119.

Thank you for the opportunity to review this Draft EIS. It is a good read. If I may, I have several editorial comments for your consideration.

People

People are ecological receptors who deserve further consideration in this environmental impact statement. Please add these two agencies to the list of contacts for consultation going forward.

1. Appalachian Regional Commission (ARC). The proposed site is in Southern Appalachia. The mission of the ARC includes consideration of human health and energy development in the region.

https://www.arc.gov/appalachian_region/TheAppalachianRegion.asp

2. Agency for Toxic Substances and Disease Registry (ATSDR). ATSDR studied ORR offsite contaminant exposure for people in this area for 20 years. A summary of relevant findings would provide historical perspective and set the stage for further consideration of human health and safety concerns.

<https://www.atsdr.cdc.gov/sites/oakridge/>

Also, look at the work of the ORNL-Environmental Sciences Division and others who are participating in environmental research and monitoring in the aftermath of the TVA-KIF coal ash spill (2008 through the foreseeable future). One of the reference reaches (CRM 8.0, R3) is just downstream from the proposed site. [See Pracheil et al. 2016 (1).]

Subsistence Fishing

Legacy contamination and institutional controls are changing our way of life. Institutional controls include advisories for human consumption of aquatic biota (e.g., fish, turtles, crayfish, and mussels) and a ban on commercial fishing in the Watts Bar Reservoir (2).

I would submit that there is subsistence fishing in the area, albeit less than in the past. There are people who observe the fish consumption advisories and practice "catch and release" recreational fishing. However, there are also people who choose to ignore the science or do not believe a word of it. These folks regularly consume locally caught fish. [See 7.3.2.1 in the 2017 DOE efficacy report (3).]

Years ago, I spoke with a young man from a multigenerational family of commercial fishermen in the Watts Bar Reservoir. He said, "When they announced that there was mercury in the fish [c 1980s], people stopped eating the fish and that put us out of business." Now there is a ban on commercial fishing.

Please consult with TWRA to establish a timeline for institutional controls promulgated in this area. My understanding is that the fish consumption advisories were initiated in the 1980s and expanded in the 1990s. The ban on commercial fishing followed. Acknowledging the historical perspective will help to explain why the question of subsistence fishing is open for debate.

Environmental Justice

We are Appalachians. Some people think that Appalachians are a minority group, too. The general population mentioned in the discussion of environmental justice includes rural Appalachians (White, non-hispanic) who need special consideration (in addition to the specified minority groups and low income communities). For example, this area is considered to be medically underserved, historically. Income criteria mean little to people who do not have access to health care at an affordable price. Our area may be in transition now. Ask the Tennessee Department of Health and the Appalachian Regional Commission.

There is another way to look at the question of environmental justice. Environmental justice requires consideration of historical antecedents to our present situation. People in this area have sacrificed repeatedly for the common good—e.g., relocation to build TVA dams from the 1930s on; relocation to create Oak Ridge in the 1940s; relocation in recovery from the TVA-KIF coal ash spill in 2008; and ongoing limitations imposed by legacy contamination and institutional controls. *Environmental justice* for the people who live here means decisions about the future will be viewed in light of our local history and the impact on our way of life.

Coda

I, for one, do not want to see anyone adversely affected in any way for any reason. I do appreciate the NRC-NEPA deliberative process that includes involving the public in a meaningful way, and I look forward to your thoughtful consideration of these editorial comments.

Lynne Roberson, Roane County, TN (area resident)

(1) Ecology. Pracheil et al. (2016) Relating fish health and reproductive metrics to contaminant bioaccumulation at the Tennessee Valley Authority Kingston coal ash spill site. *Ecotoxicology* 25(6):1136-49 doi: 10.1007/s10646-016-1668-0.

(2) Institutional controls.

a. Fish Consumption Advisories (2017).

https://www.tn.gov/content/dam/tn/environment/water/documents/water_fish-advisories.pdf

b. Proclamation on the Commercial Taking of Fish and Turtles (2017).

https://www.tn.gov/content/dam/tn/twra/documents/Proc_17-10_Commercial-taking-fish-turtles.pdf

(3) Efficacy. 2017 Remediation Effectiveness Report. DOE/OR/01-2731&D2.

<https://doeic.science.energy.gov/uploads/A.0100.064.2500.pdf>