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General Comment

Please see attached comments.

Attachments

South Florida Wildlands Comments on Turkey Point license renewal

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Director, Program Management
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Greetings:

South Florida Wildlands Association appreciates the opportunity to provide these brief scoping comments on the renewal application for the Turkey Point Nuclear Plant, Units 3 and 4. These comments will mainly outline remarks we made during the public hearing on May 31st in Homestead, Florida.

First, the Turkey Point cooling canals have become an environmental hazard for South Florida. The hot, highly saline water in the canals and its other constituents (e.g. ammonia) have been found to have created a plume of non-potable water beneath the canals and the underlying Biscayne Aquifer, a sole source aquifer for all of Miami-Dade, Broward, and the Florida Keys. Water from the canals has also been found to be leaking into Biscayne Bay as evidenced by levels of radioactive tritium in the bay many times the ordinary background radiation.

The canals are also poised to merge with the bay at some point in the coming decades – but very likely within the time frame of the extended operating license. The land the canals were dug into sits only 6 inches above sea level. And there

are no scientific predictions for sea level rise in the coming decades which envision a rise in sea levels under that amount. And berms will not help – the limestone beneath the canals is highly porous and will quickly allow in rising levels of saltwater no matter how high the berm is made.

In our comments from May 31st, we also focused on the threat from hurricanes. Scientists are not necessarily predicting more storms, but they are predicting larger, wetter, and more powerful storms. It is possible that the 2017 hurricane season was an anomaly – but few scientists hold to that opinion.

In 1992, Turkey Point took a direct hit from Hurricane Andrew. The NRC report deemed the damage “extensive.” And, as we learned from Fukushima, an event doesn’t need to damage the reactor itself to become catastrophic. Loss of all outside power, as happened during Andrew, combined with loss of generators or backup batteries (which did not occur at Turkey Point – fortunately) is enough to stop the flow of cooling water through the radioactive material on site. And that can lead to an unfolding of events that, although unthinkable, did in fact happen in Fukushima.

In the fall of 2017, Hurricane Irma had a direct bead on Turkey Point. Fortunately, it did not make the northward turn as predicted, but instead veered south into Cuba (which lessened its intensity from Category 5) and then stayed on a westward course, not turning north until it was well past Turkey Point. One of reactors had already been shut down – but the second was shut down after wind and rain from outer bands from Hurricane Irma damaged an outside valve.

Similarly, a room at the St. Lucie nuclear plant was flooded by heavy rains alone – and that was after the NRC had required a full safety review of nuclear plants for possible water damage due to weak or faulty seals. Both the NRC and the plant owner, FPL, signed off on the plant – and yet the damage occurred.

For the above reasons, we strongly believe that the Turkey Point nuclear reactors should not receive a second extension for yet an additional 20 years of operation. There are no plants operating for that length of time, storms are getting stronger, sea levels of rising, and the risk to already threatened South Florida is enormous.

We would rather see the NRC use the time before the current operating license expires to work with FPL in devising the complex plan for decommissioning both reactors at Turkey Point.

Best regards,

Matthew Schwartz
Executive Director
South Florida Wildlands Association