ClinchRiverESPEISCEm Resource

From: Ben Brooks <ben_brooks@emerson.edu>
Sent: Wednesday, July 11, 2018 10:32 AM
To: ClinchRiverESPEIS
Subject: [External_Sender] Public Comment - Clinch River DEIS (Docket 52-047)

Dear NRC staff,

I am deeply concerned about the proposed siting of experimental Small Modular Reactors (SMRs) at the Clinch River site in Oak Ridge, Tennessee. The Tennessee Valley Authority (TVA) is seeking an early site permit (ESP) to construct two or more reactors, with up to 800 megawatts (MW) of electricity generation capacity.

NRC issued a Draft Environmental Impact Statement for TVA's permit application on April 26, 2018. NRC's analysis is deeply flawed and biased toward approving this unnecessary, expensive, and counterproductive project.

NRC must reject TVA's proposal to dramatically reduce the Emergency Planning Zone from 10 miles to just 2 miles or less. The EPZ requirement defines the scope of evacuation plans and other emergency response measures must be in place in the case of a major release of radioactive material. There is no possible justification for reducing emergency planning requirements on the basis of reactor designs that have not even been approved.

The reality is that TVA's proposed SMR project is a thinly disguised subsidy to the nuclear power industry. TVA has no need to build more nuclear reactors, with a surplus of electricity and declining demand from its customers. The proposed project would be entirely uneconomical, with estimated costs 3-5 times more than the current cost of wind and solar power. Energy efficiency is yet more cost-effective.

NRC must consider the recent experience with other proposed new reactor projects, using untested new designs. South Carolina utilities abandoned building new reactors last year, but only after spending nearly a decade and $9 billion on them. South Carolina ratepayers are paying 18% of their electricity costs for partially built reactors that will never generate a watt of electricity. Had the utilities invested in solar, wind, and/or efficiency ten years ago, South Carolina would be saving money and reducing carbon emissions, with no radioactive waste.

These and other biases in the DEIS amount to promoting nuclear power over other energy sources. This is contrary to NRC's statutory mission to be a neutral regulator with the purpose of ensuring nuclear safety, not promoting nuclear power. NRC must withdraw the DEIS and perform a fair, accurate, objective analysis of TVA's site permit application, as well as the real alternatives of energy efficiency, wind, solar, and other renewable energy sources.

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