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Name: Christopher Lish

General Comment

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U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Subject: Reject Early Site Permit for Clinch River Small Modular Reactors -- Early Site Permit Application: Tennessee Valley Authority; Clinch River Nuclear Site (Docket ID: NRC-2016-0119-0037)

Dear NRC Chairperson Kristine Svinicki and 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.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- Theodore Roosevelt

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

"It is horrifying that we have to fight our own government to save the environment."

-- Ansel Adams

The NRC must reject TVA's proposal to dramatically reduce the Emergency Planning Zone (EPZ) from ten miles to just two 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.

"Then I say the Earth belongs to each generation during its course, fully and in its own right, no generation can contract debts greater than may be paid during the course of its own existence."

-- Thomas Jefferson

The reality is that the TVA's proposed SMR project is a thinly disguised subsidy to the nuclear power industry. The 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 three to five times more than the current cost of wind and solar power. Energy efficiency is yet more cost-effective.

"As we peer into society's future, we--you and I, and our government--must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow."

-- Dwight D. Eisenhower

The 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.

"The ultimate test of a moral society is the kind of world that it leaves to its children."

-- Dietrich Bonhoeffer

These and other biases in the DEIS amount to promoting nuclear power over other energy sources. This is contrary to the NRC's statutory mission to be a neutral regulator with the purpose of ensuring nuclear safety, not promoting nuclear power. The 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.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA