

ClinchRiverESPEISCEm Resource

From: Tim Judson <timj@nirs.org>
Sent: Friday, July 13, 2018 5:00 PM
To: ClinchRiverESPEIS
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Subject: [External_Sender] Docket No. 52-047 – Environmental Impact Statement for the Early Site Permit (ESP) for the Clinch River Nuclear (CRN) Site: Draft Report for Comment
Attachments: ClinchRiverESPEIS_DEIS-Comment-30-organizations_20180713.pdf

Dear Ms. Ma,

Please find attached comments, jointly filed on behalf of thirty (30) organizations, on the Draft Environmental Impact Statement in Docket No. 52-047, the Early Site Permit application for the Clinch River Nuclear site filed by Tennessee Valley Authority.

Sincerely,
Timothy Judson

Timothy Judson
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Federal Register Notice: 83FR18554
Comment Number: 1212

Mail Envelope Properties (91236D54B259614CB902689F6EBD31D646F6E5EC)

Subject: [External_Sender] Docket No. 52-047 – Environmental Impact Statement for the Early Site Permit (ESP) for the Clinch River Nuclear (CRN) Site: Draft Report for Comment
Sent Date: 7/13/2018 4:59:55 PM
Received Date: 7/13/2018 5:00:00 PM
From: Tim Judson

Created By: timj@nirs.org

Recipients:

Post Office: NIRSSRV2.NIRS.local

| Files | Size | Date & Time |
|--|-------------|------------------------|
| MESSAGE | 560 | 7/13/2018 5:00:00 PM |
| image001.jpg | 6640 | |
| ClinchRiverESPEIS_DEIS-Comment-30-organizations_20180713.pdf | | 32937 |

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:



July 13, 2018

Ms. May Ma
Office of Administration
Mail Stop: TWFN-07-A60
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Delivered via email to: ClinchRiverESPEIS@nrc.gov

Re: Docket No. 52-047 – Environmental Impact Statement for the Early Site Permit (ESP) for the Clinch River Nuclear (CRN) Site: Draft Report for Comment

Dear NRC Staff:

Nuclear Information and Resource Service (NIRS), Beyond Nuclear, Toxics Action Center, Alliance for a Green Economy (AGREE), Alliance Safe Energy Clearinghouse, Canadian Coalition for Nuclear Responsibility, Cape Downwinders, Citizens Awareness Network (CAN), Citizens' Environmental Coalition, Citizen Power, Inc., Don't Waste Michigan, Ecological Options Network, Energia Mia, Michigan Safe Energy Future, Multicultural Alliance for a Safe Environment, Native Community Action Council, Nevada Nuclear Waste Task Force, North American Water Office, Nuclear Energy Information Service (NEIS), *The Nuclear Resister*, Nukewatch (WI), On Behalf of Planet Earth, Pilgrim Watch, Promoting Health and Sustainable Energy (PHASE), Safe Energy Rights Group, Inc., San Luis Obispo Mothers for Peace, Sustainable Energy & Economic Development (SEED) Coalition, Three Mile Island Alert, Inc., Toledo Coalition for Safe Energy, and Vermont Yankee Decommissioning Alliance are deeply concerned about the proposed siting of experimental Small Modular Reactors (SMRs) at the Clinch River site near 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 (DEIS) for TVA's permit application on April 26, 2018. We believe the DEIS is deeply flawed and biased toward approving this unnecessary, expensive, and counterproductive project, and we hereby provide the following comments on the DEIS.

First and foremost, NRC must reject TVA's proposal to reduce the Emergency Planning Zone to only 2 miles or, alternatively, the reactor site boundary – less than one-quarter of a mile from the reactor building. The EPZ requirement defines the scope of evacuation plans and other emergency response measures that must be in place in the case of a major release of radioactive material. The NRC's current requirement for all commercial reactors is for a 10-mile radius Emergency Planning Zone, with further emergency planning requirements out to a minimum distance of 50 miles.

There is no basis for reducing the EPZ requirement in TVA's site permit application, and doing so would set a dangerous precedent. None of the four reactor designs being considered by TVA has yet been certified, and only one of which has even been submitted for NRC review. NRC

cannot possibly justify exempting TVA from emergency planning requirements on the basis of reactor designs that have not even been approved, much less conclude that doing so has only a “small” environmental impact. Furthermore, all of the reactor designs being considered by TVA are of the same or comparable size as commercial reactors previously licensed by NRC, for which the 10-mile radius EPZ has been and still is required. The SMR designs listed in TVA’s ESP application range in size from 60 MW per reactor to 300 MW, and TVA’s site permit is for multiple reactors up to a total of 800 MW of capacity.

The reality is that TVA’s proposed SMR project is a thinly disguised subsidy to the nuclear power industry. The construction costs advertised for SMRs are predicated upon significant economies of scale through assembly line-style manufacturing. This can only be achieved once a manufacturer has dozens of reactors on order and in production. If TVA moves forward with its goal of having the Clinch River facility online by 2026, it will likely be the first SMR project in the world. As such, the construction costs would be substantially greater than manufacturers have advertised, potentially on the order of the financially disastrous projects in South Carolina and Georgia utilizing the Westinghouse AP 1000 reactor design. The current cost estimates of SMRs are similar to initial estimated costs of the AP 1000 reactors, which have turned out to be 2-3 times more expensive. The Clinch River project is very likely to entail a severe economic impact on TVA ratepayers, and the cost differential relative to other available energy resources would constitute a massive subsidy to the commercial nuclear industry by TVA, a federally-owned corporation.

Moreover, TVA has no need to build more nuclear reactors, with a surplus of generation capacity and declining electricity demand in its service territory. The proposed project would be entirely uneconomical, with costs for just one of the proposed designs estimated to be \$5 million per MW, more than three times the current cost of wind power and five times the cost of utility-scale solar. Energy efficiency is yet more cost-effective. When “need” is part of the equation for justifying new nuclear build, reduction in need absolutely qualifies as a viable alternative to the proposal.

TVA’s proposal to invest in SMRs must be compared to energy efficiency and renewable alternatives, especially in light of the recent experience with other proposed new reactor projects. South Carolina utilities’ decision last year to cancel the Summer 2 and 3 reactors after spending nearly a decade and \$9 billion on construction demonstrates the need for a thorough environmental impact analysis of both the need for more reactors and the alternatives. South Carolina ratepayers are paying 18% of their electricity costs for partially built reactors that will never generate a watt of electricity. If the utilities had decided to invest in solar, wind, and/or efficiency ten years ago instead of pursuing a risky, failed nuclear project, hundreds to thousands of megawatts of carbon-free, nuclear-free energy would already be online. South Carolina consumers would be paying far less for electricity, with lower greenhouse gas emissions, less stress on water resources, and no additional radioactive waste, radiation exposures, or risk of catastrophic accidents.

The DEIS completely fails to consider these alternatives. The only alternatives NRC considered are different sites for TVA’s project, different cooling system features, and no new reactors at all. In addition, in considering the no reactors alternative, NRC details the alleged “benefits” of

granting the site permit – including “banking” new sites for future reactor construction – but only mentions in passing that negative impacts of nuclear power would be avoided. The alleged benefits of the site permit can only be construed as such from the standpoint of expanding the amount of commercial nuclear power generation.

These and other biases in the DEIS amount to promoting nuclear power over other energy sources, contrary to NRC’s statutory authority. The Energy Reorganization Act of 1974 abolished the Atomic Energy Commission and established the NRC to be a neutral regulator with the purpose of ensuring nuclear safety, not promoting nuclear power. NRC must withdraw the DEIS and develop a new, unbiased analysis that fairly, accurately, and objectively evaluates the environmental, economic, and public health impacts of TVA’s site permit application, as well as the real alternatives of energy efficiency, wind, solar and other renewable energy sources, which NRC has inappropriately ignored.

Sincerely,

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