

ClinchRiverESPEISCEm Resource

From: orep@everyactioncustom.com on behalf of Ralph Hutchison
<orep@everyactioncustom.com>
Sent: Thursday, July 12, 2018 4:58 PM
To: ClinchRiverESPEIS
Subject: [External_Sender] Comments re: TVA Clinch River SMR ESP DEIS - Docket ID NRC-2016-0119

Dear NRC Staff,

12 July 2018

Comments re: TVA Clinch River SMR ESP DEIS – Docket ID NRC-2016-0119

Dear NRC staff,

I am writing to object to NRC's consideration of TVA's ill-conceived participation in the Department of Energy's Small Modular Reactor program. While there is not one single good reason for TVA to be spending ratepayers' money on exploring SMRs, there are scores of reasons for NOT wasting our money on an unproven and unneeded technology.

Among them:

- There is no unmet demand awaiting Small Modular Reactors in the Tennessee Valley service area. Should TVA build SMRs, they would have no customers for the expensive energy that would be produced.
- The cost of SMR electricity is not competitive in today's energy market, a fact that is not likely to change in the foreseeable future. In Idaho, the plan to sell SMR energy on the open market failed miserably; the only "customers" for the power that would be generated are government agencies who do not actually need the power—in other words, tax payers pay on the front end by financing the technology, ratepayers pay in the middle, and taxpayers pay again when they buy energy they don't need.
- The site being considered for SMRs is not suitable for this technology. The water table is high enough (within 12 inches) as to make it almost impossible to distinguish between groundwater and surface water. Any failure of the SMR would pollute both. This would be bad enough in a pristine environment; the Clinch River, though is already heavily contaminated by materials from the DOE's weapons and research programs in Oak Ridge—the Clinch River is part of the designated National Priorities List (Superfund) area that includes the Oak Ridge Nuclear Reservation and environs.
- Nuclear waste, a problem which has plagued civilian nuclear power reactors since they were first built, remains an unresolved issue. Spent nuclear fuel is piling up at reactor sites around the country, and no repository or dump is on the horizon. Despite being called "small" modular reactors, SMRs will actually run hotter than regular reactors and generate more waste per megawatt than a regular reactor. This fact alone should eliminate this technology from further consideration.
- As a TVA customer, I object strongly to its continued participation in this program. It is past time to cut bait; the only responsible and cost-effective technologies for our future energy needs are renewable resources, and TVA should be spending its time and energy and out money developing wind, solar and other renewable energy sources. TVA seems disinclined to do this of its own accord, but the NRC, weighing all the reasons why TVA's Clinch River SMR plan is untenable, should walk away from this process and close the books.
- TVA's effort to dramatically reduce the emergency planning zone is unjustified and unjustifiable; it is one more example of the poor prospects for this effort at this site. NRC must not become a partner to this disaster-in-the-making. People living within a ten mile radius of the Clinch River site have already borne considerable environmental insults from Oak Ridge Operations; neither they nor the natural environment should be asked to bear more, especially in service of an experimental technology for which no demand exists.

Sincerely,

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