

ClinchRiverESPEISCEm Resource

From: Elisa DeBoer <edpintar@aol.com>
Sent: Wednesday, July 11, 2018 11:25 AM
To: ClinchRiverESPEIS
Subject: [External_Sender] Public Comment - Clinch River DEIS (Docket 52-047)

Dear NRC staff,

Regarding the TVA request for an early site permit for SMRs at the Clinch River site in Oak Ridge, Tennessee, the NRC's Draft Environmental Impact Statement 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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Federal Register Notice: 83FR18554
Comment Number: 2400

Mail Envelope Properties (2076073748.11891.1531322712678.JavaMail.tomcat)

Subject: [External_Sender] Public Comment - Clinch River DEIS (Docket 52-047)
Sent Date: 7/11/2018 11:25:12 AM
Received Date: 7/11/2018 11:25:14 AM
From: Elisa DeBoer

Created By: edpintar@aol.com

Recipients:

Post Office: vweb109

Files	Size	Date & Time
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Priority: Standard
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