

ClinchRiverESPEISCEm Resource

From: Danny Dyche <tolarian@juno.com>
Sent: Saturday, July 14, 2018 10:22 AM
To: ClinchRiverESPEIS
Subject: [External_Sender] Public Comment - Clinch River DEIS (Docket 52-047)

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 the TVA's permit application on 26 April 2018. The NRC's analysis is deeply flawed and biased toward approving this unnecessary, expensive, and counterproductive project.

NRC must reject the 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. Nothing can justify reducing emergency planning requirements on the basis of reactor designs that have not even been approved.

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 3-5 times more than the current cost of wind and solar power. Energy efficiency is yet more cost-effective.

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.

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 the TVA's site permit application, as well as the real alternatives of energy efficiency, wind, solar, and other renewable energy sources.

The environment is national security; pollution is treason.

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