

SUNI Review Complete  
Template=ADM-013  
E-RIDS=ADM-03

ADD: Phyllis Clark, Bill  
Rogers, Mary Neely  
Comment (3)  
Publication  
Date:2/1/2021  
Citation: 86 FR 7747

**As of:** 2/19/21 7:29 AM  
**Received:** February 08, 2021  
**Status:** Posted  
**Posted:** February 17, 2021  
**Tracking No.** 1k5-9log-ts4a  
**Comments Due:** March 03, 2021  
**Submission Type:** Web

# PUBLIC SUBMISSION

**Docket:** NRC-2020-0277

Notice of Intent to Conduct Scoping Process and Prepare Environmental Impact Statement NextEra Energy Point Beach, LLC; Point Beach Nuclear Plant, Unit Nos. 1 and 2

**Comment On:** NRC-2020-0277-0001

Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement; NextEra Energy Point Beach, LLC, Point Beach Nuclear Plant, Units 1 and 2

**Document:** NRC-2020-0277-0008

Comment (3) of Hannah Mortensen on FR Doc # 2021-02001

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## Submitter Information

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**Submitter's Representative:** Hannah Mortensen

**Organization:** Physicians for Social Responsibility Wisconsin

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## General Comment

See attached file(s).

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## Attachments

Hannah Mortensen EIS Comments

Hannah Mortensen

Executive Director of Physicians for Social Responsibility Wisconsin

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## WASTE & STORAGE

- The EIS needs to explain the storage process for waste materials and nuclear reactor process for the lay person as well as for the decision-makers. The EIS needs to address the reasonably foreseeable and perpetual impacts from storage of waste materials including spent reactor rods.
- How will the EIS address existing storage capabilities on site and the additional waste material that will be created over an extra 20 years if the license renewal is granted?

## ACCIDENT/RELEASES

- I request that the EIS address the consequences and effects of a nuclear reactor accident on each unit and as well as an accident that effects both units.
- The analysis of a reactor meltdown effect on the human environment is expected in the EIS. This credible scientific evidence relative to assessing the impact of this catastrophic scenario is within the rule of reason and now reasonably available given the incidents at Chernobyl and Fukushima Daiichi nuclear facility. NEPA requires this analysis per 40 CFR 1502.22. (<https://casetext.com/regulation/code-of-federal-regulations/title-40-protection-of-environment/chapter-v-council-on-environmental-quality/part-1502-environmental-impact-statement/150222-incomplete-or-unavailable-information>) and (4) the agency's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. For the purposes of this section, "reasonably foreseeable" includes impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason.

## WATER

- The EIS needs to address the effects of the release of water into Lake Michigan, the temperature at which the water is released and how that water effects the natural ecosystem in the surrounding lake area.
  - Are there zooplankton affected that represent a food source to higher order species?
  - Has the level of phytoplankton changed since original baseline limnological conditions and will extended licensure perpetuate and/or worsen those impacts?
  - Are there threatened or endangered aquatic species at risk from this release?
  - Are there aquatic species that we depend upon for our food supply at risk?
  - How is the discharge monitored?
  - Is there a cooling process for the water? If so, I would like more information on this process. If not, what needs to be in place?

- I request the EIS cover the impact to the soil, shoreline, and lake bottom from the discharge of water. Will there be any erosion and if so, how does that effect the operations at Point Beach and the surrounding aquatic environment?
- I request that the EIS covers the threat of water level fluctuations on Lake Michigan.
  - Will climate change models and the reasonably foreseeable impacts to water levels and climate conditions (including higher frequency of significant disasters like the Derecho that impacted the Palo, Iowa nuclear plant) be considered?
  - What measures would need to be in place to ensure high water levels do not affect the reactors or storage units?
- How will the EIS address the transportation of nuclear fuel and waste by barges on Lake Michigan as well as across land and the following risks to the environment? The EIS must address the current accident rate of all shipping vessels on lake Michigan.

## SOCIO-ECONOMIC

- I am very concerned about the socio-economic impacts to the community if an accident occurs.
  - What would happen to people's livelihoods?
  - What would happen to property values?
  - What would happen to the fishing and agricultural industry?
  - What would the economic consequences be for the county and please specify the indirect socioeconomic consequences on property tax revenues and the State of Wisconsin as a whole?
  - Would NextEra compensate the county and people into perpetuity?
- The EIS must address the full impacts to the socioeconomic environment from the no-action alternative. So, if licensure is denied, what is the impact to the wholesale power grid at the end of existing licensure and how does the reduced power to the grid impact reliability to off-takers and subsequent consumers of that electricity. Does the no-action alternative have "significant" socioeconomic impacts?

## ENSURING ACCESS TO PUBLIC AND OTHER AGENCIES

- The draft EIS needs to be provided in other languages for the public.
- Due to the challenges of internet access in rural areas as well as COVID-19 related precautions, scoping comment cards as well as comment cards for the draft EIS should be mailed to every resident and business within 25 miles of the reactors.
- The NRC website encourages the public to submit comments online and does provide a mailing address. However, due to concerns over internet access and postal mail delays in this country, will comments be accepted if they were postmarked on March 3<sup>rd</sup>?
- I request an extension of the EIS scoping comment period due to the challenges presented by COVID-19 and internet access.
- The results of early coordination and the scoping process, which includes the definition of project scope (actions, alternatives, and impacts), decisions on appropriate assessment methodologies, the extent or depth of analysis necessary, the timing of agency reviews, the

project schedule, as well as other agreements and expectations, must be communicated to all involved agencies and the public as early as possible. This information should be included in the environmental document and administrative record. As lead Federal agency, NRC should take special efforts to ensure, before indirect and cumulative impact studies are conducted, that cooperating agencies and key review agencies not object to the scope of review, including the specific methodology to be employed.

## ALTERNATIVE ANALYSIS

- The purpose and need for the proposed action will obviously be based on electric demand on the wholesale power grid and the ability to meet that demand reliably and cost-effectively. For required NEPA proposed action alternative analysis, the EIS should adequately address meeting the purpose and need with alternatives that include alternative energy production scenarios such as photovoltaic plus storage and use of natural gas power plants to help control intermittency of non-hydroelectric renewable electric generation?
- When Point Beach was built, alternative energy was not as common and not as economical, therefore this EIS needs to take a “hard look” at the alternative options of differing energy sources in comparison to the proposed action of extending the license of the reactors. The analysis should include comparative analysis of the proposed action to alternatives with respect to jobs and tax base include indirect effects of alternative energy scenarios in the burgeoning clean energy economy.
- The EIS must provide analysis of potential “significant” positive impacts on the human environment from the proposed action **AND** alternatives.
- The EIS must fully address impacts from the no action alternative. If the no action alternative is denial or relicensing both reactor units, this alternative must fully address the impacts of decommissioning the plant and returning the property and land use to its former state. The EIS must provide data to the public that shows adequate funding has been set aside or escrowed for decommissioning and maintaining the spent fuel storage facilities into perpetuity under the no-action alternative.
- The EIS needs to address reasonable and prudent alternatives to re-licensing the reactors. This needs to be sufficiently analyzed. This alternative analysis should not only be limited to equivalent power production methods but also power demand reduction measure including broad-based energy efficiency and distributed generation incentives and measures by those power companies purchasing the existing and proposed nuclear-derived power.
- Could one of the alternatives to the proposed action be that only one of the two reactors is re-licensed?
  - If so, what are the following effects?
  - What are the impacts to grid reliability and the resultant indirect socioeconomic impacts (e.g., see impacts from California utility-imposed blackouts during wildfire season)?
  - How does the impact of licensure of only one unit impact the cost of power from the nuclear plant as compared to the cost of power from other sources (i.e., does the financial operational efficiency of the plant decrease with only one unit available resulting in a higher cost per kWh or MWh to the wholesale power grid)?

## OTHER

- The EIS needs to address the baseline scientific studies used or the lack of baseline studies to adequately monitor the effects on the environment from the proposed action.