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# 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

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## General Comment

Point Beach Unit 2 at Point Beach, WI has the worst-embrittled reactor pressure vessel of any pressurized water reactor in the country. Decades of additional neutron radiation bombardment have increased the risk of a pressurized thermal shock, through-wall fracture, core meltdown, and catastrophic release of hazardous radioactivity.

To give an idea of how catastrophic, in terms of casualties and property damage, consider the U.S. Nuclear Regulatory Commission's (NRC) own CRAC-II report. CRAC is short for Calculation of Reactor Accident Consequences. It is also known as "Technical Guidance for Siting Criteria Development," the 1982 Sandia (National Laboratory) Siting Study, NUREG/CR-2239, and/or SAND81-1549.

In the event of a core meltdown at Point Beach 2, CRAC-II predicted: 500 peak early fatalities (acute radiation poisoning deaths); 9,000 peak early (radiation) injuries; and 7,000 cancer deaths (latent cancer fatalities).

In terms of property damages, CRAC-II predicted \$43.8 billion, expressed as Year 1982 dollar figures. When adjusted for inflation alone, this figure would now be \$119 billion, in Year 2020 dollar figures. And as Associated Press investigative journalist Jeff Donn reported in June 2011, in the aftermath of the beginning of the Fukushima Daiichi nuclear catastrophe in Japan, in his four-part series "Aging Nukes," populations have soared around U.S. nuclear power plants like Point Beach, so casualty figures would now be even worse than CRAC-II predicted nearly 40 years ago.

Donn also cited neutron radiation embrittled reactor pressure vessel pressurized thermal shock risk as the top example of NRC regulatory retreat in the past number of decades.

And as Fukushima has also shown, reactor meltdowns can proceed domino effect at multi-reactor sites. A meltdown at Unit 2 could lead to a meltdown at Unit 1, or vice versa, in which case those casualty and property damage figures above would have to be doubled.

Three more decades of operation by this facility would be terrible public policy and a serious - and unnecessary - threat to the health and well being of the people and the ecosystems in the area and beyond. This facility doesn't need an extension of its license to operate. It needs to have all licenses and permits revoked immediately, along with an order to produce a decommissioning plan that can commence immediately upon approval.