

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

ADD: Phyllis Clark, Bill
Rogers, Mary Neely
Comment (38)
Publication Date:2/1/2021
Citation: 86 FR 7747

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| As of: 3/2/21 4:06 PM |
| Received: February 25, 2021 |
| Status: Pending Post |
| Tracking No. klk-metv-2tfb |
| 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-DRAFT-0042

Comment on FR Doc # 2021-02001

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General Comment

Point Beach's OE leaves a lot to be desired. This century, the two reactors at Point Beach, in certain years, had a majority of the NRC's "red findings" -- the agency's highest safety violation designation, amongst the entire U.S. fleet of operating reactors -- then numbering 104 -- combined.

Similarly, at the very same time, WI's Kewaunee reactor -- a short distance from Point Beach (about the same distance as between the now infamous Fukushima Daiichi and Daini nuclear power plants in Japan) -- had a majority of the NRC's "yellow findings," the agency's second highest risk designation, more than the rest of the 103 operating reactors combined.

Kewaunee's permanent closure was announced in late 2012, and implemented in early 2013. In fact, Kewaunee's closure commenced a record-breaking number of atomic reactor shutdowns across the U.S. since.

Another such reactor that has closed for good, Fort Calhoun in Nebraska, was given a red finding in the aftermath of a climate change-induced natural disaster: historic flooding on the Missouri River in the spring and summer of 2011. Fort Calhoun never recovered, and was permanently shut down.

Given Point Beach's very bad OE, and the ever increasing risks of breakdown phase age-related degradation accidents and disasters, Point Beach reactors simply should be shut down for good, and replaced with safer, cleaner, more secure, more affordable renewable sources, such as wind power, solar power, as well as efficiency and energy storage, such as batteries and compressed air energy storage. This is readily achievable, considering the decade or longer left on the two Point Beach reactors' 60-year operating licenses. A decade or longer is plenty of time to achieve such a just energy transition in WI. Especially so, when considering that WI hosts the cutting edge Midwest Renewable Energy Association.

In addition to renewable sources of electricity being ready to affordably displace Point Beach, energy efficiency should be maximized. In fact, nega-watts, as dubbed by Amory Lovins of the Rocky Mountain Institute, and the cheapest kilowatt-hours to be had -- those that never had to be generated in the first place.

Dr. Arjun Makhijani of the Institute for Energy and Environmental Research concluded in his 2007 book *Carbon-Free and Nuclear-Free: A Roadmap for U.S. Energy Policy*, that the U.S. economy -- the largest of any country on Earth -- could readily and affordably go nuclear power-free and fossil fuel-free, relying entirely on renewables and efficiency, within just a few decades, if only we chose to.

Since, Dr. Makhijani has done multiple state-level analyses -- such as in Maryland -- showing how to practically accomplish this carbon-free and nuclear-free energy economy. The same could readily be done in Wisconsin as well. After all, WI hosts the Midwest Renewable Energy Association, a national leader in its field.