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**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-0108

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## Submitter Information

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## General Comment

If Point Beach is to be allowed to operate for not 60, but rather 80 years, then it is high time for cooling towers to be required to be installed.

Point Beach has no cooling towers. Unit 1 has operated since 1970. Unit 2 has operated since 1973. And that entire time, these atomic reactors have been dumping 2/3rds of the waste heat generated from the splitting of atoms, directly into Lake Michigan.

Unit 1 and Unit 2 are each rated at 1,800 Megawatts-thermal. This means that both units regularly discharge 1,200 MW-t of waste heat into Lake Michigan, for lack of cooling towers. This has gone on for more than half a century. Now Point Beach proposes continuing to do so not for 10 more years, but 30 more years.

These waste heat discharges cause a significant, negative environmental impact on the Lake Michigan environment and ecosystem. Not only are life forms sucked into the Point Beach nuclear power plant via cooling water inflow -- and thereby injured or killed -- but the waste heat discharge water flow increases the temperature of Lake Michigan out to a significant distance. The elevated temperature is disadvantageous to indigenous species of plants and animals, while advantageous to certain non-native/invasive species.

Please see the Beyond Nuclear report entitled Licensed to Kill: How the Nuclear Power Industry Destroys Endangered Marine Wildlife and Ocean Habitat to Save Money, for more information on the ecological impacts of atomic reactors that lack cooling towers. It is posted online here:

<[http://static1.1.sqspcdn.com/static/f/356082/3590840/1247621149403/ltk\\_full.pdf?](http://static1.1.sqspcdn.com/static/f/356082/3590840/1247621149403/ltk_full.pdf?token=CoXF%2BvQtuOods%2Fajf6xEV4dtO2M%3D)

[token=CoXF%2BvQtuOods%2Fajf6xEV4dtO2M%3D](http://static1.1.sqspcdn.com/static/f/356082/3590840/1247621149403/ltk_full.pdf?token=CoXF%2BvQtuOods%2Fajf6xEV4dtO2M%3D)>. While the report's title refers to "marine" and "ocean," the report also examines atomic reactor thermal waste water discharges into rivers, lakes,

reservoirs, etc. The report's lessons learned are certainly applicable to Point Beach's negative thermal waste water discharge impacts on Lake Michigan's ecosystem.

The lack of cooling towers has led to atomic reactors not operating for 60, much less 80 years. The State of New York made clear to Indian Point's owner that if cooling towers were not installed, it would not allow Indian Point to operate for 60 years. The state retains authority over surface water quality, as re: the Hudson River, and asserted that authority at Indian Point. Indian Point's owner, Entergy, does not want to spend the \$2.5 billion, or more, it would cost to install cooling towers. Thus, Indian Point Unit 2 shut for good in April 2020. Indian Point 3 will shut for good in April 2021.

Indian Point's two reactors were responsible for killing a billion fish and other aquatic life forms each and every year, for a half century. This represents a massive harm perpetrated on the Hudson River ecosystem by a nuclear power plant lacking cooling towers.

The lack of cooling towers at the Oyster Creek, New Jersey atomic reactor also led to permanent shut down, even before expiration of its NRC operating license. NRC rubber-stamped a 20-year extension at Oyster Creek, allowing it to operate for 60 years. However, the State of New Jersey, under the governorship of Chris Christie, agreed to only allow Oyster Creek to operate 50 years, but not 60 years, due to the lack of cooling towers. This "deal," to allow Oyster Creek to violate the Clean Water Act for 10 additional years, while still lacking cooling towers, was questionable. Oyster Creek should have been forced to close at the end of its 40-year initial license. But Gov. Christie agreed to allow Oyster Creek to continue violating the law, and harming Barnegat Bay, for another decade. In the end, though, Oyster Creek did close for good on Sept. 17, 2018, because its owner did not want to spend the money to build cooling towers, in order to continue operating for yet another decade into the future.

During its half century of operations, once every six weeks, the single reactor at Oyster Creek would draw in a volume of water equivalent to the entire volume of the narrow, shallow Barnegat Bay. Immense harm was done to Barnegat Bay's ecosystem by this half century of cooling water intake, and thermal waste water dumping, abuse.

If Point Beach is going to be allowed to operate for another three decades, on top of the five decades it has already operated, then cooling towers must be installed. Point Beach has already done immense harm to Lake Michigan's ecology. This cannot be allowed to continue for 30 more years, including during yet another 20-year license extension.

Sincerely,

Kevin Kamps

Beyond Nuclear, Radioactive Waste Specialist; Don't Waste Michigan, Board of Directors Member, representing the Lake Michigan Chapter; Citizens for Alternatives to Chemical Contamination, Advisory Board Member

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