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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

**Document:** NRC-2020-0277-DRAFT-0186

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## Submitter Information

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## General Comment

(Beyond Nuclear, comment #11, Part 3)

Given the June 2004 survey on Point Beach's own property, that identified 15 isolates and one prehistoric archaeological site, as well as the nearly three-dozen Indigenous culture affiliated sites listed in Point Beach's own Table 2. Archaeological Sites Inventory Entries within a 6-Mile Radius of PBN, it is hard to understand how Point Beach can stand by the claim that there are likely no more Indigenous cultural resources or properties on its site. After all, it has admitted that nearly 300 acres have never even been surveyed, in the past 53 years of site physical disturbance and irradiation, with apparently no plans to do so for another 30+ years of operations. And Point Beach Nuclear already admitted it didn't even check for Indigenous properties and resources that may very well have been located under the physical footprint of its constructed facilities. Those, regrettably, may already have been damaged or destroyed by Point Beach Nuclear, a half century or longer ago.

The basic form letter goes on:

"In preparation for the subsequent license renewal application, PBN conducted a literature review of the Wisconsin Historic Preservation Database to identify previously recorded sites within a 6-mile radius. The results of the 2020 literature review are presented in Table 2."

It is unclear how thorough the surveys in the six-mile radius of Point Beach, for Indigenous cultural properties and resources, have been. So very much may have been missed, if the surveys were not thorough nor comprehensive. Meaningful, respectful, legally and constitutionally mandated and required sovereign nation to sovereign nation consultation with the 52 Indigenous Nations identified -- and likely numerous others not yet identified by Point Beach Nuclear -- would almost certainly shed a lot more light.

In addition to federally recognized Indigenous Nations' governments, why were the traditional and spiritual leaders of these Indigenous Nations not consulted?

A final sign of disrespect comes at the end of the basic form letter, where Point Beach writes: "Your response is kindly requested within 45 days of receiving this letter."

The lone individual at each of the 52 Indigenous Nations written to probably has an overwhelming work burden on a good day. But these are not good days. A national pandemic emergency has gripped the entire country for over a year now. And Indigenous Nations are among the hardest hit communities of all, in our entire country, disproportionately so. 45 days is way too little time for meaningful consultation. Especially considering the context -- yet another 20-year license extension, on top of 60 already permitted, filed 10 years ahead of time. As well as the million year hazard that will be generated during that latest 20-year extension -- 800 metric tons, or more, of deadly, hazardous, highly radioactive waste, with nowhere to go, with no safe, sound solutions in sight.

In addition, Indigenous Nations likely have very limited resources to process such a letter from Point Beach Nuclear. And yet there is no offer of funding from Point Beach or NRC to help defray costs, or enable the work necessary to mount a meaningful sovereign nation to sovereign nation consultation.

I urge both Point Beach and NRC to do just that, engage in meaningful sovereign nation to sovereign nation consultations with each of the 52 already identified Indigenous Nations, and any not yet identified, in order to fulfill treaty right legal and constitutional obligations, as well as a sign of basic respect and common courtesy.

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

and Kay Drey, Beyond Nuclear Board of Directors President (University City, Missouri)

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Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear