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Docket: NRC-2020-0234

Notice of Intent to Conduct Scoping Process and Prepare Environmental Impact Statement Virginia Electric and Power Company; North Anna Power Station, Unit Nos. 1 and 2

Comment On: NRC-2020-0234-0144

Virginia Electric and Power Company; Dominion Energy Virginia; North Anna Power Station, Unit Nos. 1 and 2

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Comment on FR Doc # 2021-18255

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General Comment

North Anna Power Station is an incredibly safe, reliable, low cost, 24/7, carbon-free source of electrical generation in central Virginia. The improvements made to the power station over the past 40 years have added significantly to the safety of the plant. This includes the many modifications done to make the plant more robust to natural events, such as the 8/23/11 earthquake. I know, as a Licensed Professional Engineer, that North Anna Power Station is one of the most robust and safest Nuclear Power Plants in the U.S. and world.

As part of the Environmental Impact Statement, I encourage the NRC to consider (and calculate) the impacts of;

- 1) Replacement of 24/7 electrical generation. What are the current viable sources? Some would be solar/wind, but these are not 24/7 forms of electricity. Storage of 1,900 MWe of power is not viable through batteries. Most notably, Natural Gas and/or Coal would be needed to handle summer/winter peaking. The CO2 effects need to be incorporated.
- 2) The Environmental Impact of constructing 1,900 MWe of 24/7 electrical production. For instance, solar is only 25% efficient, so 7,600 MWe of Solar would need to be constructed to replace North Anna Power Station. The Environmental Impact of producing this many solar panels (including the mining of rare earth metals), and the land impact of a 7,600 MWe solar farm in central Virginia needs to be part of the Environmental Impact Statement. This also must include the proper decommissioning and disposal of these 7,600 MWe of solar, since they have a finite life. The same logic needs to be applied to any wind that is proposed (only 60% efficient).
- 3) The Economic costs need to be also evaluated. The cost of construction of the replacement of 1900 MWe (and the cost to the Virginia Rate Payers) needs to be part of the evaluation. North Anna Power

Station is a low-cost producer of Electricity. Replacement costs would be 3-5 times higher (or more, if batteries are considered). This will have an adverse impact on the Rate Payers of Virginia.

4) The impact on Lake Anna also needs to be considered. The lake was built to support the power plant. With no flow through the WHTF, what will be the impact on the aquatic life? Indeed, would the Dam at the end of the lake be removed? If not, who will maintain the Dam? Clearly not Dominion, since the purpose of the Dam (to support North Anna Power Station) would be eliminated. In addition to the obvious negative consequences to the residents around the lake, this also has consequences for downstream users on the North Anna and Pamunkey rivers.

4) The negative impact on the citizens of Louisa County must be considered. The loss of revenue (direct and indirect) are consequential.

In summary, it is my firm professional belief the the NRC should grant a License Renewal for North Anna Power Station, and that the Environmental Impact Statement should include the adverse effects of building so much extra replacement power. The Environmental Impact Statement should consider the impact of the raw construction, as well as the long term negative effects to the extraordinary land useage that replacement Electrical Generation would entail. Finally, Economic impacts are real, and should be considered.

Eric Hendrixson, PE