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# PUBLIC SUBMISSION

**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

**Document:** NRC-2020-0234-DRAFT-0144

Comment on FR Doc # 2021-18255

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## Submitter Information

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## General Comment

See attached file for comments from the Fauquier Climate Change Group on Docket ID NRC-2020-0234.

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## Attachments

NRC Comments on Lake Anna Nuclear Plant License Renewals 09162021

**Docket ID NRC–2020–0234**

Comments on NUREG-1437, Supplement 7, Second Renewal, Draft

My name is Judy Lamana and I appreciate the opportunity to submit comments to the Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, on the draft Supplemental Environmental Impact Statement (SEIS) regarding a second license renewal for North Anna 5 Power Station, Units 1 and 2 (NUREG-1437).

I am submitting comments as the founder of the Fauquier Climate Change Group (FCCG), which is based in Warrenton, Virginia, 60 miles north of the North Lake Anna 5 Power Station.

**Support for Second License Renewal**

The FCCG supports this second license renewal for the two existing Lake Anna nuclear power plants as it has the lowest environmental impact of the options detailed in the SEIS.

This support is also premised on the belief that the two Lake Anna nuclear power plants have been operating within government-set safety parameters and that this will continue to occur through the time period of their second license renewal.

We also believe that low-carbon baseload electrical power provided by the two Lake Anna nuclear power plants is critically needed to address the global climate crisis.

**Analysts See a Role for Nuclear Power in Our Region**

In the minds of many analysts, nuclear power can make sense in the mid-Atlantic and southern regions, as renewable resources are less abundant and the regulatory framework for vertically integrated utilities is more conducive to such plants. The state of Virginia neither has the solar intensity of the Southwest nor the wind of the Midwest, making it an appropriate location for nuclear power plant siting. Also, Dominion Energy is a vertically-integrated regulated utility that is subject to oversight by the State Corporation Commission.

## **Second Renewal Has Less Impact than the Combination Alternative**

The Combination Alternative (Solar, Offshore Wind, Small Modular Reactor, and Demand-Side Management) that is also under consideration by the NRC is more resource intensive than renewing the license for the two existing nuclear power plants as new construction would be required.

In terms of land needs alone, the NRC reports that the Combination Alternative would require 20,000 acres of land for the solar energy portion and 72 square-nautical miles of ocean area for the wind power portion. While small modular nuclear reactor facilities would need 36 acres at the Lake Anna site, demand-side management would require no land.

The use of resources to simply replace or extinguish demand for the low-carbon baseload electricity provided by the two Lake Anna nuclear power plants is not efficient. Resources would be better used to build the new power generation that is needed to meet the carbon-free mandate of the Virginia Clean Economy Act (VCEA).

(Replacing the Lake Anna nuclear power plants with only wind power and/or solar power is not practical due to their inability to provide baseload electricity (their power is intermittent) and there is not enough storage capacity available to mitigate this limitation.)

This concludes my comments. The FCCG hopes that the NRC agrees with us on these SEIS issues and grants a second license renewal for the two Lake Anna nuclear power plants.

Judy Lamana  
Founder, FCCG

*The mission of the Fauquier Climate Change Group is to raise awareness of climate change and advocate solutions that reduce greenhouse gas emissions, in order to avoid the worst impacts of climate change.*