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# PUBLIC SUBMISSION

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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-2020-0277-0194

NextEra Energy Point Beach, LLC; Point Beach Nuclear Plant, Units 1 and 2

**Document:** NRC-2020-0277-DRAFT-0212

Comment on FR Doc # 2021-24407

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## General Comment

The EIS contains an inadequate assessment of risk to human health in the event of a severe nuclear accident at PBNP (particularly if unmitigated, i.e. a reactor core meltdown). The current EIS for PBNP references NRC's The State of the Art Reactor Consequences Analysis (SOARCA). See Appendix F 4.2, pp 354-355/369.

- We do not agree with the EIS conclusion "As a result, the calculated risks of public health consequences of severe accidents modeled in SOARCA are very small." P. 355/369

- PSR WI's issues with the NRC's 2012-3 assessment of human health consequences from a severe accident include:

- The modeling SOARCA uses is greater than 15 years old. Additionally, MELCOR from 1991 (and last reviewed by the NRC in 2006) assesses an accident at Surry, another Westinghouse Pressurized Water Reactor similar to Point Beach Units 1 and 2, but this is not an assessment of PBNP specifically.

- SOARCA assesses only the risk of individual cancer deaths, not cancer morbidity. Cancer morbidity is the risk of contracting cancer from excess radiation exposure.

- It does not include estimates of excess deaths in individuals who would be evacuated from their homes and die from lack of accessible diagnosis and treatment of chronic conditions or the increase in significant mental illness for those displaced, some of what is being noted for the declining health of US populations during the Covid-19 pandemic. I'm very concerned about the safety issues.