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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-2020-0277-0194

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

**Document:** NRC-2020-0277-DRAFT-0218

Comment on FR Doc # 2021-24407

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## General Comment

NRC Public Participation Deficiencies; public participation is difficult because:

- true public concerns like climate change, contaminated water and air, etc. are not addressed so the public isn't able to comment or understand the regulatory aspects well.
- Easy zoom workshops should be given for public to ask questions

### CLIMATE CHANGE

2. It is worth noting that the section on climate change needs to be completely rewritten so that it is based on the most current data from the Intergovernmental Panel on Climate Change - the IPCC 2021 report.

- This report needs updating with current information
- The most recent IPCC Report referenced in the climate change section of NRC's Draft Generic EIS is from 2007. It is unacceptable.
- The immediate and imminent impacts of climate change on operations at PBNP are new categories of consideration for an EIS, and much of the science and observed changes are recent phenomenon, which underscores why the most current data must be used and why this topic must receive a fresh and new appraisal of conditions. Fourteen year old data is not acceptable.
- The number of extreme weather events has increased dramatically in the last decade.
- Lake level fluctuations and larger storm surges contribute to an increase in erosion along the shores of Lake Michigan, threatening reactor operations. Meanwhile, over 1,000 metric tons of nuclear waste are stored onsite at PBNP, on the shoreline of Lake Michigan. Lake level is a huge concern

### ALTERNATIVE ACTIONS

3. "Alternatives Actions" is completely inadequate.

If the license at PBNP is not renewed, the alternatives considered do not include the use of wind power, either onshore or offshore, or energy conservation.

- Two of the three proposed alternatives require implementation of Small Modular Reactors (SMRs), reactors which do not exist and are not currently available.
- SMRs do not exist as a viable source of electricity.
- There must be at least one Alternative Action plan based on 100% renewable.

#### LAKE MICHIGAN

4. Environmental damage to the ecosystem in Lake Michigan related to intake of almost one billion gallons of Lake Michigan per day, and the discharge of over 900 million gallons of heated water (24 degree F above ambient lake temperature) daily from the reactors is not scientifically addressed in the draft EIS.

- Water intake kills fish, fish larvae, fish eggs and other aquatic organisms. The NRC's EIS authors must include updated quantitative data on PBNP's damage to the aquatic ecosystem and cumulative effects on Lake Michigan now and in the "foreseeable" future.
- Heated water discharge from PBNP's 'once through' cooling system is not the Best Technology Available (BTA). Installing cooling towers. Thermal pollution is not addressed adequately

#### TIME CONSIDERATION

5. The "foreseeable future" was considered by NextEra and the NRC to be only until 2053. Radioactive waste needs to be safeguarded for thousands of years. Cumulative effects and extended effects are also disregarded.

#### SAFETY

6. The EIS contains an inadequate assessment of risk to human health.

Severe nuclear accidents at PBNP (particularly if unmitigated, ie. a reactor core meltdown) must be considered.

- SOARCA does not address accidents related to stored fuel.