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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-0228

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General Comment

Thank you for the opportunity to comment on the Point Beach Nuclear Reactors (PBNP) and the draft generic Environmental Impact Statement (EIS).

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.

Specifically, the report is the “AR6 Climate Change 2021: The Physical Science Basis,” published August 2021. Since the current PBNP licenses extend until 2030 and 2033, there is plenty of time for the NRC to get up to speed with the latest in climate science, produced by the United Nations IPCC, a significant collaboration of hundreds of the world’s leading climate scientists. This is a conservative, rigorously science based organization, and the 2021 report is eye-opening.

The most recent IPCC Report referenced in the climate change section of NRC’s Draft Generic EIS is from 2007. It is unacceptable for the NRC to present fourteen-year-old data as a sound scientific basis for projecting what climate conditions will be at PBNP 32 years into the future – that is a 46 year knowledge gap. Data from this year, 2021, is available on the internet; using it makes it only a 32 year knowledge gap about actual climatic conditions at the site of the two atomic reactors operating on the shore of Lake Michigan, a precious Wisconsin asset.

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. The August 2020 derecho event in Iowa damaged the Duane Arnold Nuclear Reactor facilities, which narrowly escaped a catastrophic nuclear accident. Point Beach is similarly vulnerable to derechos, tornados and extreme weather events.

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 Michigan recorded a record low lake level in 2013, and only seven years later, recorded a record high lake level in 2020.