

**From:** Jim Cunningham <jimc.guitarz@gmail.com>  
**Sent:** Thursday, December 30, 2021 9:06 PM  
**To:** PointBeach-SLRSEIS Resource  
**Subject:** [External\_Sender] Comment on EIS regarding PBNP license renewal

I was forced to split my initial comments as submitted on the appropriate website due to an unreasonable limit to the size of the comments. It seems to me that such a limit is merely a surreptitious method for creating difficulties for educated citizens to fully participate in assuring their safety. Here are my comments in their entirety:

These comments are made regarding the NUREG-1437 Supplement 23 Second Renewal EIS document pertaining to the renewal of license to operate the Point Beach Nuclear Plant Units 1 and 2 well beyond the established duration limits of safe operation as laid out in the initial design parameters.

The proposed action fails to establish a viable purpose.

“The purpose and need for the proposed action (i.e., issuance of subsequent renewed facility operating licenses for Point Beach) is to provide an option that allows for power generation capability beyond the term of the current nuclear power plant renewed operating licenses to meet future system generating needs.”

This initial statement ignores the fact that the units are already operating beyond their designed limits of safe operation. In making this statement, the NRC is abrogating the regulatory aspect of the agency itself, rendering this EIS an exercise in pro-corporate profit sophistry rather than an examination of scientific facts regarding safe operation to benefit the public. It is my understanding that the whole point of having an NRC is to protect the public from the greed-based motives of for-profit businesses in any form, in this instance relating to those involved in the operation of these units. It also summarily ignores a wide range of viable alternatives in favor of propping up energy company profits.

Regarding the “alternatives” section, there are not only blatant falsehoods, but also a complete failure to truly address all alternatives.

“The NRC staff evaluated each potentially feasible and commercially viable replacement power alternative and the no-action alternative using the same resource areas that it used in evaluating impacts from license renewal. The NRC staff also evaluated any new and significant information that could alter the conclusions of the SAMA analysis that was performed previously in connection with the initial license renewal of Point Beach in 2005.”

It is apparent to me that the “same resource areas” used for evaluating impacts from this license renewal are woefully inadequate and most likely seriously outdated. After disregarding recent data available for a range of clean energy alternatives, the NRC is discarding multiple viable alternatives and focusing on just three, two of which rely on technology that does not even exist – Small Modular Reactors have not even been designed let alone tested, proven or manufactured. Reliance on non-existent technology is fantasy and has no place in a serious appraisal of public safety. There is no composite 100% renewable energy alternative considered. Furthermore, if the license at PBNP is not

renewed, the alternatives considered do not include the use of wind power, either onshore or offshore, or simple energy conservation.

“The NRC staff’s preliminary recommendation is that the adverse environmental impacts of subsequent license renewal for Point Beach are not so great that preserving the option of subsequent license renewal for energy-planning decisionmakers would be unreasonable.”

This recommendation statement egregiously ignores the fundamental nature of nuclear energy in that it requires great danger to acquire and process the fuel, no human being has even a remote idea of what to do with the massively toxic and essentially eternal waste, or the very real possibility of catastrophic failure which would contaminate the drinking water for millions of American citizens for decades, if not centuries – not to mention the potential loss of life for anyone nearby or the many decades of radiation poisoning that would inevitably follow. I cannot agree that the profits generated or the power delivered are worth the potential for widespread death, disease, and destruction.

As it stands, this section of the EIS is not simply completely inadequate, it is downright dangerous.

This document is full of statements which rely on outdated information.

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. “AR6 Climate Change 2021: The Physical Science Basis,” was published August 2021, but is not referenced in this document. 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 should receive an updated, current appraisal of conditions. With more than 1,000 metric tons of eternally toxic nuclear waste stored on site, and the continued operation of reactors which are operating well beyond their designed duration limits, the use of fourteen-year-old data is not acceptable as a basis for evaluating the multiple risks to public safety.

Impacts on Lake Michigan are inadequately described in this document.

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, at 24 degree F above ambient lake temperature, daily from the reactors is not scientifically addressed in the draft EIS. This aspect must be addressed in a thorough revision of this document through the lense of current climate change data.

Water intake kills fish, fish larvae, fish eggs and other aquatic organisms including micro-organisms on which the web of life in the lake rely. The document states that these impacts to “aquatic resources” are considered to be “small”, but I am unable to believe that assessment. The temperature impacts alone are enough to cause a failure in the interconnection of lake species and could lead to large scale fish kills. Heated water discharge from PBNP’s ‘once through’ cooling system is not the Best Technology Available (BTA). Installing cooling towers, long the industry standard, would reduce use of lake water by

85%. I do not see anywhere in this document that such an implementation is required or even recommended.

Under “Special Status Species and Habitats” it is stated that there would be, “No effect on essential fish habitat.” As I stated above, the impacts on water temperature alone are quantitatively deleterious to marine life. It is well-known that water temperatures in the Great Lakes are increasing due to climate change, and that those changes are harming native species while favoring invasive species. 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 within the duration parameters of the proposed license renewal operating periods.

Under “Environmental Justice” it is stated that, “No disproportionately high and adverse human health and environmental effects on minority and low-income populations.” Yet, these old, worn-out units are some of the most deteriorated units in the US. It is not a matter of “if” they will fail, but “when” they do fail that these populations will be most affected. In the meantime, the dangers of the waste stored there remain. In fact, this document contains an egregiously inadequate assessment of risks to human health in the event of a severe, and likely, nuclear accident at PBNP. That this document contains the following statement indicates to me that it was produced by industry insiders with no regard for public safety and only a concern for industry profits at the expense of public safety:

“As a result, the calculated risks of public health consequences of severe accidents modeled in SOARCA are very small.” P. 355/369

In summary, this document is inadequate at best, and represents a danger to the public as it indicates that the NRC is no longer a government agency tasked with keeping the public safe, but instead just an arm of a criminal and careless industry seeking profits at any cost to the public. It contains, and bases conclusions on, vastly outdated information/data, it minimizes obvious impacts in favor of industry propaganda, and it fails to assess viable energy alternatives in any meaningful manner.

Thank you for considering my comments.

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