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**Subject:** [External\_Sender] Docket ID No: NRC-2020-0234. Comments on NRC Draft Supplemental GEIS for Point Beach (CIECP & PHASE submission)

January 3, 2022

**RE: Comments of Council on Intelligent Energy & Conservation Policy (CIECP) and Promoting Health and Sustainable Energy (PHASE) on U.S. Nuclear Regulatory Commission (NRC) Draft Supplemental Generic Environmental Impact Statement (DSGEIS) for the NextEra Point Beach Nuclear Plant Units 1 and 2 Subsequent License Renewal, Docket ID No: NRC-2020-0234, NUREG-1437, Supplement 23, Second Renewal**

U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Via e-mail [PointBeach-SLRSEIS@nrc.gov](mailto:PointBeach-SLRSEIS@nrc.gov)

The Council on Intelligent Energy & Conservation Policy (CIECP) and Promoting Health and Sustainable Energy (PHASE) hereby submits these Comments to the U.S. Nuclear Regulatory Commission (NRC) on the NRC's Draft Supplemental Generic Environmental Impact Statement (DSGEIS) for the NextEra Point Beach Nuclear Plant Units 1 and 2 Subsequent License Renewal, Docket ID No: NRC-2020-0234, NUREG-1437, Supplement 23, Second Renewal.

CIECP-PHASE fully supports and incorporates by reference the points made in the Comments on the DSGEIS submitted by Beyond Nuclear on December 29, 2021; the Coalition Comments on the DSGEIS submitted on January 3, 2022; and the filings submitted by Physicians for Social Responsibility Wisconsin in connection with its Petition to the NRC for Leave to Intervene and Request for Adjudicatory Hearing in Point Beach Nuclear Plant Units 1 and 2 Subsequent License Renewal Proceeding on March 23, 2021 (PSR WI), inclusive of the expert declarations of Alvin Compaan, PhD, Mark Cooper, PhD, and Arnold Gundersen, ME.

CIECP-PHASE will not burden agency staff with repetition of the facts and matters raised in the documents identified in the preceding paragraph.

We do wish, however, to place emphasis on the points which follow and to register our profound dismay over the NRC's deficient and superficial consideration of the host of hazards and risks being arbitrarily and capriciously disregarded in the DSGEIS.

Among these are the following factors and conditions which have emerged or considerably elevated in recent years. Despite the repetitive, meandering, and lengthy course taken by the DSGEIS, none are seriously considered. All interrelate inextricably with both accident risk and cumulative impacts presented by the prospect of running Point Beach until the 2050s.

**(1) The environmental and human impact consequences of a major accident must consider all reasonably plausible triggers and presume the loss of capability to mitigate conditions at the nuclear site.**

- (2) The known unknowns and prognosticated effects and conditions of global warming.**
- (3) The potential health and environmental consequences of continuing exploitation of and strain placed upon Lake Michigan, including thermal pollution and the impacts upon its use as a source of public drinking water.**
- (4) The cumulative environmental consequences of additional decades of radionuclide emissions into the air and into Lake Michigan – including carbon-14.**
- (5) The cumulative health and environmental consequences of uranium mining, milling, and enrichment, including additional releases of radiation and other chemical toxins released by the uranium fuel cycle activities into the environment (especially toxic metals like cadmium) upon populations most susceptible to radiation and toxic chemicals, such as women, adolescents, children, babies, breast-fed infants and the embryo/fetus.**
- (6) The potential health and environmental consequences of decades more of high-level and low-level nuclear waste.**
- (7) Reasonable energy alternatives, especially the renewable clean forms of energy and energy services that are promoted by the *current administration* and are widely viewed as the core energy technologies needed to combat climate change. Prime among these are efficiency, a distributed variety of renewables, microgrids, demand-side options, and battery/storage.**
- (8) Environmental justice, especially the legacy and cumulative full life cycle environmental and health impacts on indigenous, lower income and communities of color of the front, waste transport, and back ends of the uranium fuel cycle.**
- (9) The long-term tax and economic effects of placing a term high level nuclear waste dump on the banks of Lake Michigan for an indefinite, and potentially centuries-long, duration.**
- (10) The age of Point Beach in concert with the integrated and multiplier risks of all of the above which will exponentially increase the potential damage calculation in every area of concern.**

As not just Fukushima demonstrated, but multiple extreme weather events such as those that led to the multiple weather events that contemporaneously or in near sequence slammed into vast swaths of the nation have shown, climate impacts are now reasonably likely to cause widespread power outages, loss of road and railway access, the necessity for evacuation of large numbers of people, and – very often – the loss of communication, and compromise of situational awareness on the part of public officials and first responders.

The near-miss loss of the electric grid during the February 2021 disaster in Texas should stand as a warning. Independently and in conjunction with such conditions must be added the extensive and dynamic risks attendant to the world of cyber and to emerging technologies such as artificial intelligence and drones. Additional realities which need to be taken into consideration include the frayed state of the nation's institutions and the increasingly alarming threat of domestic unrest and malevolent actor behavior. The chaos unleashed by the pandemic and the events of January 6, 2021 serve as an obvious warnings.

There is no reasoned basis for the NRC to disregard the real world conditions that exist even today.

The NRC's conclusion in the DSGEIS that the consequences of an accident – even a beyond design basic accident – would be small transcends the concepts of arbitrary and capricious and leaps into the domain of the ludicrous.

Consideration of relicensing a nuclear plant to run for 80 years warrants a particularly stringent and comprehensive analysis of *all* factors relating to the environment and public wellbeing. Such a long operation extension will impact the environment and public health in multiple and very likely unanticipated ways. Continued operation well into the century will also most certainly present substantially elevated challenges, especially with respect to changing climate and other conditions and externalities over which neither the NRC nor the site operator will have control.

We submit the many uncertainties and risks emerging even today caution strongly against pushing aging already deteriorating machines past their limits. Moreover, the vast array of issues related to existing nuclear waste – of all classifications – remain unresolved after nearly 80 years. Facilitating generation of even more radioactive wastes is feckless and irresponsible.

Problematically, this entire Point Beach Nuclear Plant Units 1 and 2 (Point Beach) Subsequent License Renewal Application proceeding has the tenor of a needlessly rushed effort to give the operator – and the industry – the benefit of all doubts at the considerable expense of public safety, environmental protection, and the strained national budget.

We can see no valid policy reason why, in the middle of a historic pandemic and amidst the transition to a more sustainable energy system, there is any rationale which would support determinations which will impose serious limitations on the freedom of policymakers to transition to a cleaner, safer, more climate-friendly, energy regime.

Simply put, there is no defensible rationale which supports lock-in of the American people to 80 year reactor license periods and 80 years of perpetual production of radioactive waste at any commercial nuclear power plant, much less to reactors which sit on the nation's most vital Great Lakes, which provide drinking water and economic sustenance to tens of millions.

Notably, the current operating licenses for Point Beach Units 1 and 2, respectively, extend until October 2030 and March 2033. What exactly is the imperative at right this moment to gain authorization to run the reactors until 2050 and 2053? Operator profits? Yes. Public interest? No.

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