From: Alfred Meyer <alfred.c.meyer@gmail.com>
Sent: Tuesday, January 4, 2022 12:21 AM
To: PointBeach-SLRSEIS Resource
Subject: [External_Sender] NRC-2020-0277-0194
Attachments: Meyer Point Beach DGEIS Comments.docx

My comments are attached.

Please accept this late submission due to internet problems.

Thank you,

Alfred Meyer

Federal Register Notice: 86FR62220
Comment Number: 276

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220103 ACM DGEIS Comments

RE:

Climate Change in 2022 presents new and unusual conditions of concern which are not addressed by the Draft GEIS currently at hand. The most up-to-date knowledge and data must be used as the basis to project what potential climate conditions are likely to be in 2053, and how those anticipated potential conditions can impact the operations of the Point Beach reactors. The NRC must demonstrate its improved understanding of the implications of climate change relative to license renewal by providing public comment for a new site specific EIS for Point Beach.

Alternative Actions considered in this SEIS are inadequate and must be revised. Currently two of the three alternatives presented are based on SMR reactors, which do not currently exist for deployment, meaning that those two alternatives are not viable and must therefore be omitted from consideration.

Also, an 100% renewable option must also be added as an alternative to be considered. This alternative must incorporate the latest science and knowledge of this fast developing field.

CLIMATE CHANGE

The Section on Climate Change must be fully rewritten using up-to-date knowledge and data. The resulting new draft section on Climate Change must be made available for public comment.

Given that new kinds of climate change related events are occurring with increasing regularity and intensity, and that new scientific knowledge, data and understanding of them is concurrently and significantly growing, it is incumbent upon the NRC to utilize the most current knowledge to consider and assess projected conditions in 2053, 31 years into the future.

Why does the NRC utilize the IPPC reports on the state of climate change in the world from the years 2002 and 2007, but NOT have any reference to the 2021 report? This up-to-date report is available on line [link]. How in good scientific practice can the NRC present references that are 14 and 20 years old in a fast changing scientific field be used when there is a report from last year, 2021, readily available? This omission is reprehensible. Presenting such out-dated references is an insult to the general public which expects much more professional performance from an agency regulating such exceptionally dangerous nuclear activities and charged with protecting public health.

During the public Scoping Meeting and at the public DSEIS meetings, I called attention to the dramatically evident current changes in climatic events which we see unfolding with increasing regularity, like the Boulder Colorado fires just days ago. The Point Beach reactors are perched on the edge of Lake Michigan. I noted that the record low lake level was recorded in 2013, and record high lake level occurred a mere seven years

later in 2020. Additionally storm size, intensity and duration are increasing dramatically, as seen in the 200 mile long belt of tornados in Kentucky which included some individual tornados that were one mile wide! What kinds of winds and waves might blow into Point Beach 31 years from now? How fully has the NRC's assessment accounted for the site specific conditions in Two Rivers, Wisconsin?

Scientific data and understanding of climate change

Although long ago predicted, the growing evidence of climate change is literally at our doorsteps. Massive rainfalls, high velocity winds, extended droughts, fires, greater volatility and greater extremes (just as I learned in a public lecture in Madison Wisconsin in 1974, explaining the results of research sponsored by the US Department of Defense). The bottom line is to expect changing weather patterns characterized by greater volatility and greater extremes; hotter hots, colder colds, wetter wets and dryer drys. As these changes progress in real time today, we observe an increasing number of unusual weather events; the fires in the suburbs of Boulder, Colorado and the tornados in the Kentucky areas to name just two recent such occurances.

This is our new "normal" which must be fully accounted for in this DSEIS. The present draft is noticeably deficient in any accountability for such concerns and potential conditions in a generic sense, and further more, lacks any site specific 'hard look' analysis of the particular impacts on the lake, the shoreline, the new sorts of storms, and the facilities at Point Beach at this specific location on the Lake Michigan shoreline. A new draft must be presented for public review and comment to ensure that the NRC demonstrates to the satisfaction of the public that its comprehension of the immediate imperative to consider the new topic of climate change in depth with a 'hard look'.

Just as climate change events are unfolding with greater frequency and intensity, so too is our scientific knowledge and understanding of climate change is increasing. This license extension proceeding is projecting, at a minimum, 31 years into the future. Realistically and prudently, knowing that high level nuclear waste will be on site well past cessation of reactor operation, in the best case scenario, we should be projecting for at least 130 or more years into the future, as no country on earth presently has an answer for what to do with the irradiated 'spent nuclear fuel' produced by fissioning uranium in reactors.

Given the current conditions of increasingly greater weather volatility and greater extremes, it is imperative that the effective EIS for Point Beach license extension consideration be based upon the most up to date and site specific information available.

Climate change itself is literally exploding on our horizons; concurrently the scientific understanding and data base, vibrant and fast developing fields of study, are yielding many new opportunities. How can the NRC represent itself as a world class regulatory agency when it uses 14 and 20 year old data instead of the readily available current data to project potential conditions 31 years into the future?

While it is true that the 2021 IPCC report and the NRC DGEIS were both published in the same year, what is the hurry here? The existing Point Beach licenses are good until 2030 and 2033, so if the NRC needs more research time in order to include the most up to date information about climate change effects on Lake Michigan and the Point Beach facility in particular in its assessments, then by all means the NRC has plenty of time in which to accomplish this.

As a member of Physicians for Social Responsibility Wisconsin, I must ask the NRC commissioners how comfortable you would feel if you learned today that your doctor is treating you based on 14 or 20 year old medical data and knowledge instead of today's latest information? Don't you expect that a professional, be it nuclear regulatory or medical, will apply the latest and most up-to-date knowledge and understanding in the practice of the profession? Especially when making projections well into the future?

Clearly it is incumbent upon the NRC to provide a rewritten draft of the SEIS Climate Change section that is based on current information and made available for public comment.

ALTERNATIVE ACTIONS

The Draft GEIS as presented is deficient regarding Alternative Actions to be considered. It needs to be redrafted and presented to the public for comment.

Two of the three alternatives currently proposed are based on non-existent technology - SMRs - small modular reactors. There are none 'on the shelf' ready for implementation, so in reality, these two alternatives are not viable because they do not exist. Presumably an Alternative Action must exist to be considered, otherwise this becomes an exercise in fantasy.

Furthermore, in recognition of the year 2022 in which we live and the great advances over the past few decades in the renewable energy sources of solar, wind and storage, the NRC must analyze at least one 100% renewable option as an alternative. To fail to do so defies today's reality and the options it presents.

Respectfully submitted on 3 January 2022.

Alfred Meyer
alfred.c.meyer@gmail.com