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ADD: Tam Tran, Antoinette
Walker-Smith, Ted Smith, Mary
Neely
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Vistra Operations Company LLC Comanche Peak Power Company LLC Comanche Peak Nuclear Power Plant, Units 1 and 2

Comment On: NRC-2022-0183-0003

Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement; Vistra Operations Company LLC; Comanche Peak Nuclear Power Plant, Units 1 and 2

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Submitter Information

Name: Mary Ames

Email: amesink@earthlink.net

General Comment

RE: Docket ID NRC-2022-0183

The Honorable Christopher T. Hanson and members of the NRC:

I'm writing to urge you not to extend the licenses for the Comanche Peak nuclear reactors -- instead, to reject the application by Vistra to extend the operating licenses for an additional 20 years. To protect public health, safety, and security, as well as the financial health of investors and ratepayers, the reactors should retire as currently licensed, on or before 2030 and 2033.

Further, I request that in-person scoping meetings be held in Texas, as originally planned, when Covid risks subside. The opportunity for a hearing must be given all members of the public seeking to intervene. The deadline for requesting a hearing should be postponed for 90 days past the current January 30 deadline, especially in light of the arbitrary fashion in which public notice has been given and withdrawn in the past. And an opportunity to speak should be provided to people who cannot attend meetings during the day and those who cannot attend online.

I am concerned about the increased safety risks and financial burdens that would result from allowing another 20 years of Comanche Peak nuclear reactor operation. Risks from stress corrosion cracking, metal fatigue and embrittlement all increase with time, and thus increase the potential for accidental radiation releases. There are 7.76 million residents in the nearby Dallas/Ft. Worth area. The health and safety of those residents should be paramount in the NRC's decision-making. In addition, neither the NRC nor any other government agency has identified a permanent storage site for the tons of radioactive waste produced during the past 50 years or more. What, then, does the NRC propose to do with waste that will result from an extension of the life of this and other nuclear plants? If current proposals are any indication, the waste will be dumped near communities that don't

have the financial means or political clout to object and it will be guarded by private entities more concerned with profit than with public or environmental safety.

Furthermore, scoping should consider all the alternative resources that could be developed to produce energy more safely and inexpensively than operating the aged Comanche Peak reactors up to, and beyond, the middle of this century. Renewable solar and wind generation are already more affordable and safer ways to meet the energy needs of Texans. The state has abundant renewable resources to tap and a grid to move the power where needed.

Seismic concerns regarding both the Comanche Peak reactors and the Squaw Creek Reservoir must be re-examined in light of recent earthquake activity. Comanche Peak is within the Barnett Shale, a region with extensive fracking and numerous injection wells. Fault lines cross the area. The epicenter of a magnitude 3 earthquake was located only 20 miles from the reactor site. The integrity of the reservoir's earthen dam must be a major component of the scoping, including the results of prior inspections and a new examination of the extent to which seismic activity has affected the dam, or may in the future. How great is the risk of rupture? How much cooling water could be lost? Enough to cause a significant event? Even small amounts of leakage are a public health issue since the reservoir water contains radioactive tritium.

Due to the many issues of public concern surrounding this application, I look forward to notification that the deadline for intervention in the review process has been extended and that in-person hearings will be scheduled at times convenient to the general public.

Thank you for your attention to these comments.