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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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General Comment

RE: Docket ID NRC-2022-0183

Dear NRC:

Don't extend aging Comanche Peak nuclear licenses. The risk of failure for each component, part, and system of the reactors increases each year as they age, embrittle, and aggregate minor pits, cracks and flaws. The trend to more severe weather in the region indicates an increasing risk of a storm related failure or incident. The gradual accumulation numerous radioactive fission byproducts in various components of the reactors increase the hazard when an accident does occur.

The dramatic increase in the population living near the reactors means that many more are at risk from any accidental release of hazardous materials. This also means that many more are exposed to allowed routine releases, and any unreported releases. The continued operation of Comanche Peak reactors, and maintaining the radioactive waste thus created, no doubt contributes to rising background radiation levels and to the epidemic of cancers across society.

Perhaps most importantly, the continued operation of the Comanche Peak nuclear power plants compete with the emerging sustainable energy sources, slowing the development of the new generation of electric power production. The megalithic electric generation model is obsolete and needs to be rapidly replaced by decentralized, small scale, solar, wind, hydro, and energy storage systems. This evolution of our power grid requires investment of resources that are currently being squandered on maintaining the Comanche Peak reactors.

I urge you to reject the application by Vistra to extend the operating licenses for the Comanche Peak nuclear power reactors for an additional 20 years. To protect public health, safety, security, and financial health, the

reactors should retire as licensed, on or before 2030 and 2033.

I request that in-person scoping meetings be held in Texas, as originally planned, when Covid risks subside. I request that a hearing opportunity be allowed for those seeking to intervene and that the deadline for requesting a hearing be postponed for 90 days past the current January 30 deadline.

Both an afternoon and evening public meeting were scheduled, but then postponed at the last moment, without adequate public notice. Four hours of in-person meeting time were reduced to only two hours online. There is now no evening opportunity to participate for people who work in the day, and not everyone can access online meetings. There will be no exhibits or opportunity to speak directly with NRC staff.

I am concerned about the increased safety and financial risks that would result from allowing another 20 years of Comanche Peak nuclear reactor operation. Risks from stress, corrosion, cracking, metal fatigue and embrittlement would all increase, and thereby increase accident risks and the potential for radiation releases. There are 7.76 million residents in nearby Dallas/Ft. Worth. Public health and safety should come first in this decision.

Scoping should consider that there is no need for 20 more years of nuclear power. Renewable solar and wind generation are the most affordable and safest way to meet energy needs. Texas has abundant renewable resources to tap and a grid to move the power as needed.

Seismic concerns of both the reactors and the Squaw Creek Reservoir need to 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. There are fault lines in the area and a magnitude 3 earthquake had its epicenter only 20 miles from the site. The reservoir water contains radioactive tritium, and the integrity of the earthen dam must be included in the scoping, including the extent of inspections and past and anticipated impacts to the dam from seismic activity.

Please extend the deadline for intervention and host in-person meetings and hearings.

Thank you.