

# PUBLIC SUBMISSION

ADD: Tam Tran, Antoinette  
Walker-Smith, Ted Smith, Mary  
Neely  
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**Docket:** NRC-2022-0183

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:** Bruce Campbell

**Email:** madroneweb@aol.com

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## General Comment

RE: Docket ID NRC-2022-0183

To the NRC:

Please side with logic, precaution, and Murphy's Law by rejecting any extension of operating licenses for the major nuclear reactors at Comanche Peak, Texas.

The risk is too much to this most populated urban area in northern Texas -- and the risk is amplified by the fact that the NRC refuses to offer U.S. utilities a choice to buy their preferred variety of container for spent fuel rod assemblies from commercial nuclear power facilities. Instead they choose only between thin canisters (the Holtec canister is advised to be stuffed with 37 spent fuel rod assemblies such that there are huge vents on the top of the canisters so that some of the extreme heat from the spent fuel waste from "high burn-up fuel" can dissipate), while Dr. Singh the CEO of Holtec admitted at the San Onofre Community Engagement Panel that his company's CANISTERS cannot be inspected, re-packaged or transported -- and yet this sleazy company, who merged with a Canadian company convicted of bribery, plans to ship shoddy thin canisters stuffed with the hottest of radwaste over our nation's highways and railways to their so-called "interim storage" radioactive waste dump in southeastern New Mexico.

Don't extend aging Comanche Peak nuclear licenses.

Kindly move forward with a rejection of the application submitted 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. Seeing that we are referring to a matter with the next decade in mind, we can certainly wait several months which may see covid numbers sink to the point that it would make sense to have an in-person hearing within the State of Texas. It is

also important that hearing opportunities are offered to formal intervenors within the NRC process. Please allow another month (it is the shortest!) to allow people to formal pull together their legal intervenor status -- through the end of February 2023 at any rate!

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 (plus embrittlement of cement as well) 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 -- dang, your sprawl is almost matching ours in L.A.!

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. One consideration in your deliberations should be the overall increase in risk of serious radioactive accidents not only through the ridiculously-accelerated processes and transport relating to nuclear power facilities -- combined with the huge # of processes and transport of toxic and radioactive materials related to the HALEU process being foisted upon American lately. (Low Enriched High Assay Uranium .. look it up!)

Thank you.