

From: Joseph R. DeMare <joe@joedemareforagreenfuture.org>
Sent: Monday, June 10, 2024 1:05 PM
To: MonticelloEnvironmental Resource
Subject: [External_Sender] Comments on Monticello Nuclear Reactor License Extension—NRC-2023-0031

Dear NRC RE: Monticello Reactor Jessica Umana,

Dear NRC,

Based on the INWORKS study (Cancer mortality after low dose exposure to ionising radiation in workers in France, the United Kingdom, and the United States (INWORKS): cohort study BMJ 2023; 382 doi: <https://doi.org/10.1136/bmj-2022-074520> (Published 16 August 2023) Cite this as: BMJ 2023;382:e074520), the NRC's use of the Linear No Threshold (LNT) model does NOT protect the public sufficiently. Very low doses can cause significant increases in cancer mortality beyond what LNT predicts. Consequently, NRC must deny Monticello's application because even routine tritium releases are harming those who use the Mississippi water.

The NRC has never denied a license extension. Many believe the agency is too thoroughly captured to effectively regulate the industry. Even the NRC admits this reactor is contaminating the river. Since any level of contamination is unacceptable, Monticello's application to continue must be denied.

Please extend the public comment period on your Draft SEIS, and please deny the application by Northern States Power Minnesota for a second license renewal for its Monticello reactor.

NSPM/Xcel has repeatedly said there is “no health risk” to the public or reactor workers because the affected groundwater contains “very low levels” of tritium. But, the Nuclear Regulatory Commission's website warns: “[T]he radiation protection community conservatively assumes that any amount of radiation may pose some risk for causing cancer and hereditary effect, and that the risk is higher for higher radiation exposures. A linear no-threshold dose-response relationship is used to describe the relationship between radiation dose and the occurrence of cancer. ... any increase in dose, no matter how small, results in an incremental increase in risk.” (U.S. NRC, “Radiation Exposure and Cancer,” <https://shorturl.at/ooBKx>)

Further, at the May 15, 2024 NRC public hearing in Monticello, MN, NRC Project Management Branch 1 Chief Stephen Koenick apologized for the NRC's use of “misinformation” claiming that no detectable tritium was found in the Mississippi. Koenick said: “However ... we ... conclude there were some very low concentrations of tritium in the Mississippi River.” (Transcript, NRC public hearing, Monticello Community Center, Monticello, MN, May 15, 2024)

The NRC has concluded that Monticello's leaked tritium discharged to this drinking water source. River water dilution does not eliminate the tritium which persists in the water for about 123 years (10 radioactive half-lives). Even trace amounts of tritium ingested in drinking water increases a person's risk of cancer, pregnancy problems, birth abnormalities, and other illnesses. This is especially true for women, girls, and fetuses, because tritium crosses the placenta. For these reasons, deny the applicatio

Sincerely,
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