

Comments from the Southern Alliance for Clean Energy Regarding the NRC's Waste
Confidence DGEIS – Public Teleconference – December 9, 2013

1.866.522.SACE
www.cleanenergy.org

P.O. Box 1842
Knoxville, TN 37901
865.637.6055

46 Orchard Street
Asheville, NC 28801
828.254.6776

250 Arizona Avenue, NE
Atlanta, GA 30307
404.373.5832

P.O. Box 1833
Pittsboro, NC 27312
919.360.2492

P.O. Box 50451
Jacksonville, FL 32240
904.469.7126

P.O. Box 13673
Charleston, SC 29422
843.225.2371

Good afternoon and thank you for holding today's teleconference. My name is Sara Barczak and I am the high risk energy choices program director with the Southern Alliance for Clean Energy (SACE). We are a regional non-profit organization with members across the Southeastern U.S. and are concerned about the impacts energy choices have on our health, economy and environment. I participated previously and provided brief comments at the October 1, 2013 webcast/teleconference and my colleague, Mandy Hancock, participated in the public meeting in Orlando, Florida on November 6.

I would like to reiterate our disappointment that a public meeting was not held in Atlanta, Georgia. A meeting in Atlanta was requested by U.S. Representative Hank Johnson and supported by several organizations including SACE. Despite Atlanta having 11 nuclear reactors within 170 miles, compared to the 5 reactors within 215 miles of Orlando, the NRC denied the request citing in part a lack of resources yet Atlanta is NRC's Region II headquarters. Atlanta is also a major metro area and serves as a hub for airline and bus transportation from multiple surrounding states, which would have made it much more accessible and affordable than Orlando to organizations and residents from many reactor communities. People in Atlanta were forced to travel nearly 6 hours to attend the Charlotte hearing. And for NRC staff that attended the Orlando meeting, you are well aware that the participation was very low in comparison to the other public meeting locations – just a couple dozen people. Members of the public living in the TVA region, among other utilities' service territories, were offered essentially no reasonable opportunities to attend an in-person meeting. It is clear that the NRC should have held more meetings in more locations across the country.

In addition to the comments we provided the NRC previously, we have serious concerns about the impacts climate change may have on the long-term storage and management of spent nuclear fuel. The effects of climate change, especially sea level rise and subsequent expected increases in storm surges and catastrophic weather events puts reactors that are along the country's coastline and even low-lying inland locations at great risk. For instance, given Florida Power & Light's Turkey Point location near Miami next to the Everglades and Biscayne Bay, sea level rise and storm surges are real threats that must be considered. We do not believe that the NRC and its licensee can ensure that spent nuclear fuel can safely sit at Turkey Point for even one hundred years let alone indefinitely. This is true of other reactor locations as well. The NRC must re-evaluate the impacts of climate change as section 4.18, *Environmental Impacts of Postulated Accidents*, appears to be woefully inadequate. We do not agree with the NRC's conclusions made regarding climate change specifically for design basis events in spent fuel pools on p. 4-75 and dry casks on p. 4-78, and severe accidents in spent fuel pools on p. 4-81 and severe accidents with dry cask systems on p. 4-83, and believe this analysis needs to be more robustly conducted.

We would like to make the NRC aware that since the comment period began, a new, sophisticated tool has been released, *Surging Seas*, a sea level rise analysis by Climate Central, which can be found at <http://sealevel.climatecentral.org/>. Map pages show threats from sea level rise and storm surge to the more than 3000 coastal towns, cities, counties and states in the Lower 48. Three states, New York, New Jersey and Florida, now have expanded next-generation maps and analysis available, in the Surging Seas Risk Finder with more states to follow. Thank you for the opportunity to comment.