

## CCNPPEISCommentsResource

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**From:** Edsel Brown Jr [emb@edselmbrownjr advisors.com]  
**Sent:** Wednesday, April 16, 2008 2:20 PM  
**To:** CalvertCliffsCOLAEIS Resource  
**Subject:** NAACP Comments  
**Attachments:** 3072799988-NAACP.doc

Attached is a microsoft word version of the NAACPs comments, you might have had difficulty opening the micosoft works version.

Edsel M. Brown Jr.  
First Vice President  
NAACP-Calvert County Branch

**Federal Register Notice:** 73FR8719  
**Comment Number:** 176

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**Subject:** NAACP Comments  
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**From:** Edsel Brown Jr

**Created By:** emb@edselmbrownjr advisors.com

**Recipients:**  
"CalvertCliffsCOLAEIS Resource" <CalvertCliffs.Resource@nrc.gov>  
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***NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE  
CALVERT COUNTY BRANCH  
P. O. BOX 1865  
PRINCE FREDERICK, MD 20678***

*Joyce Freeland  
President*

April 14, 2008

Chief, Rules and Directives Branch  
Division of Administrative Services  
Mailstop T6-D59  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Dear Chief, Rules and Directives Branch:

This letter is written on behalf of the National Association for the Advancement of Colored People, Calvert County Branch (NAACPCCB). We would like for you to consider our comments as you (Nuclear Regulatory Commission - NRC) conduct the Environmental Impact Study (EIS) of the Constellation Energy-Unistar Combined Operating License Application for a 3<sup>rd</sup> reactor at Calvert Cliffs (Calvert County, Md). Our concerns are outlined under the captions listed below:

**Environmental Impact:**

NAACPCCB would like the NRC to conduct a comprehensive analysis of the potential environmental impact of a 3<sup>rd</sup> reactor at Calvert Cliffs. This impact study should not only consider the impact of the new reactor itself but the potential impact it will have in concert with the other two reactors.

**Toxic Waste Disposal:**

A system of disposal is already in place for the existing two reactors at Calvert Cliffs. NAACPCCB is concerned about the existing disposal program especially in terms of transport of the waste out of the county, and the impact an accident could have on the community. In addition, a 3<sup>rd</sup> reactor will create more waste, and more possibilities for accidents. NAACPCCB insists on the facility having a detailed plan outlining the disposal of all waste, and contingency plans in the event of accident.

**Safety:**

To date, Constellation Energy has had a fairly solid track record of safety with the existing two reactors at Calvert Cliffs. Again, with a 3<sup>rd</sup> reactor, the potential for accident increases by 33%. Constellation Energy must outline its safety procedures for the reactors, including possible terrorist activity. Calvert Cliffs is the closest nuclear facility to Washington, DC and offers a very attractive target for those that would like to make a

political statement in the metro DC area. Constellation Energy must document that it will have adequate security personnel to safeguard its facility as well as the citizens of the surrounding area.

NAACPCCB would also like to see formal training programs conducted county wide on emergency preparedness in the event of a leak (aka Three Mile Island) or other emergency. Regular drills (annually) would also seem to be in order.

**Traffic:**

Traffic is an issue related to both safety as well as regular traffic patterns in the community.

First of all, in terms of safety. Since the county only has one major route (Route 2/4) to exit the county, what type of integrated exit strategy does Constellation Energy and Public Officials (county, state, federal) have for citizens of the county.

The second traffic issue relates to the potential impact on traffic patterns in Calvert County as a result of the new reactor. With increased staff, deliveries, and related businesses to support the site expansion, what plans are being put in place to assure that the expansion will have little or no impact on travel.

**Police/Fire:**

Constellation Energy must demonstrate that it has coordinated its safety plans with both Police and Fire Departments at all levels of government (county, state, federal).

**Housing:**

Constellation must demonstrate that its staff will have access to reasonable housing. Since Calvert County has limited apartment availability, plans must be established to ensure that the staff of the new reactor can acquire living quarters in the county. Over the last several years there have been major issues with healthcare, law enforcement, and other key professionals finding it difficult to acquire housing in the county.

**Community Development Projects:**

NAACPCCB would like to view a plan of action of any and all Community Development Projects Constellation Energy has outlined as it readies development for the 3<sup>rd</sup> reactor.

**Training:**

The operation of three nuclear reactors requires a technically proficient and well trained workforce. What steps is Constellation Energy taking to train its current and future staff? What steps has Constellation Energy taken to provide training at local colleges (eg College of Southern Maryland)?

**Jobs:**

NAACPCCB is concerned about employment at Calvert Cliffs, especially as it relates to minority and women staffing levels. NAACPCCB would like to review current and

planned staffing plans for the facility. This would include a breakdown of existing staffing levels (both managerial and non-managerial), as well as those planned for the new reactor. It is of utmost importance that the facility demonstrate its commitment to diversity. As a leading employer in the county, it must lead by example.

**Contracting:**

The development of Calvert Cliffs to include a new reactor will be a major development project. It is essential that Constellation Energy provide an outline of how it plans to make sure that minority and women contractors get a fair share of the contracting opportunities.

NAACPCCB would like to be included in any distribution list of procurement opportunities. In addition, NAACPCCB would like Constellation to consider the development of a Mentor-Protégé Program to assist small firms in developing their capabilities.

This proposed project will have a major impact on Calvert County for decades to come. It is imperative that the issues outlined above, and others forwarded to your attention by other organizations and concerned citizens be considered before moving forward with the project.

NAACPCCB thanks you for the opportunity to comment. If you have any questions, please feel free to contact us at (410) 877-5039.

Sincerely,

*Edsel M. Brown Jr.*

Edsel M. Brown Jr.  
First Vice President  
NAACP, Calvert County Branch

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