

Fermi3CEM Resource

From: Thomas Stephens [thomasstephens2043@sbcglobal.net]
Sent: Wednesday, January 11, 2012 7:39 PM
To: Fermi3COLEIS Resource
Subject: AMENDED Comments Re Fermi 3
Attachments: AMENDED Fermi 3 Written Comments 01 11 12.doc; Fermi 3 Written Comments.doc

THE ONLY CHANGE FROM THE COMMENTS PREVIOUSLY SUBMITTED ON JANUARY 5 AND ATTACHED FOR YOUR CONVENIENCE IS A NEW PARAGRAPH REGARDING WALPOLE ISLAND:

Walpole Island First Nation Community

Walpole Island First Nation should have been included in the NRC scoping process and public notices because its members would be affected by Fermi 3. The NRC must reopen the licensing process for this purpose. The Walpole Island First Nation's traditional fishing territories are located within the affected radius, but "because it is in Canada, the review team did not include it in its environmental justice investigation." (v 1, p 2.187) However, North American Indians have the right to trade and travel between the United States and Canada under Article III of the Jay Treaty. Walpole Island First Nation members inhabit U.S. and unceded indigenous territories in addition to Canadian territory, and many Walpole Island members are U.S. citizens.

January 11, 2012

Chief, Rules, Announcements, and Directives Branch

Mail Stop: TWB-05-B01M

U.S. NRC

Washington, DC 20555-0001

AMENDED Comments Re: NUREG 2105

Docket ID NRC-2008-0566

TO WHOM IT MAY CONCERN:

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The obviously biased and preconceived opinions of DTE spokesmen and local Monroe County economic development advocates articulated at the public hearing on December 15, 2011, exemplify the inability to learn from history. If allowed to determine policy and decisions regarding this bioregional and global issue, this narrow, self-interested mind set guarantees the repetition of this poisonous, deadly history. Building giant nuclear plants in the 21st century, in the wake of this industry’s literal, financial and liability meltdown over the past 50 years, on the basis of local economic development and corporate profit opportunities, would be objectively insane.

It is vital to keep the proposal’s basic insufficiency to meet the most elementary test of logic or history in mind throughout the course of any discussion of these topics. Otherwise we risk falling into the trap of a “crackpot realism” that accepts dictates of power and greed, and limits debate to trivial, marginal issues; as if the request for a license backed by great financial power equates to a “right” to pollute and abuse. It is critical to expressly reject that premise at the outset and throughout.

The very consideration of such a proposal at this stage of our society’s tragic and failed experiments with nuclear power evidences a corrupt intellectual and regulatory system environment. It is as if Goldman Sachs, in the wake of the Wall Street collapse in the Fall of 2008, were to propose some new derivative investment scheme “weapon of financial mass destruction,” akin to the creative frauds that critically wounded the global economy; as if financial regulatory authorities were to give it respectful consideration; and as if its employees were enlisted to publicly claim what all now know to be false: that their private gamble with the lives and health

of our communities represents sound public policy and economic development.

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Waste Disposal

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Overcapacity

Unfortunately, Michigan’s long economic decline in recent years has hurt our people and our resilience. One silver lining to this depressed economic time is a demonstrated reduction in the need for electric power generation. Michigan’s people are not in a position to pay higher electric utility rates for this incredibly expensive technology, so that DTE can generate electricity by boiling water with nuclear technology, to generate power that can be sold elsewhere at a profit on the deregulated electricity market. Michigan is not in a position to run the awful risks of hosting this failed technology to benefit its corporate sponsor’s bottom line by

selling power to other regions. Michigan does not need Fermi 3.

Since local leaders have emphasized the alleged local economic development benefits from the proposal, such as construction jobs and a few operation jobs, the DEIS in fairness should evaluate such claims in terms of a full cost/benefit analysis, accounting for all alternatives and all their statewide and bioregional economic effects. This analysis should specifically include the investment of the equivalent capital in renewable power sources such as wind, solar and geothermal, and in energy conservation. DTE's proposal to take the massive resources needed to construct a commercial nuclear reactor away from such authentic green alternatives, as we struggle to find adequate responses to the dual crises of climate change and peak oil, is outrageous.

Lake Erie

The proposed Fermi 3 is inconsistent with survival of Lake Erie and its aquatic life resources as a Great Lake, in terms of both its massive overuse of lake water and its pollution and overheating of the lake. The DEIS states that "Fermi 3 operations would result in an average consumptive use of approximately 7.6 billion gallons of Lake Erie water per year." (v 2, p 10.9) "Unavoidable adverse impacts on aquatic ecology resources would include an increased potential for entrainment, impingement, and thermal loading to Lake Erie..." The document addresses the current water quality concerns regarding Lake Erie, and identifies serious water problems. Increased phosphorus loading, causing toxic algae; and elevated concentrations of three bio-accumulative contaminants (dioxin, PCBs, and mercury). "On average, concentrations of mercury in site surface water exceeded the Michigan Department of Environmental Quality Rule 57 for human noncancerous values and wildlife values." (v 1, p 2.28)

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The western basin of Lake Erie "is of the greatest concern with regard to construction and operation of Fermi 3. The western basin receives 95 percent of the water that drains into Lake Erie, including five major river drainages (Maumee River, River Raisin, Huron River, and Detroit River) as well as numerous smaller streams that discharge directly into the western basin." (v 1, p 2.70) Since Lake Erie borders the US and Canada, the existing Fermi 2 is already polluting International Waters. Fermi 3 threatens to turn Lake Erie into a dead lake.

Walpole Island First Nation Community

Walpole Island First Nation should have been included in the NRC scoping process and public notices because its members would be affected by Fermi 3. The NRC must reopen the licensing process for this purpose. The Walpole Island First Nation's traditional fishing territories are located within the affected radius, but "because it is in Canada, the review team did not include it in its environmental justice investigation." (v 1, p 2.187) However, North American Indians have the right to trade and travel between the United States and Canada

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Respectfully submitted,

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Recipients:
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Walpole Island First Nation Community

There are many tribal fishing enterprises on the Canadian side of the lake, and many tribes have dual citizenship in the United States and Canada. The Walpole Island First Nation community’s fishing territories are located within the affected radius, but “because it is in Canada, the review team did not include it in its environmental justice investigation.” (v 1, p 2.187) Whether Walpole Island First Nation residents inhabit sovereign lands, Canadian or US territories, they should have been included in the NRC scoping process and the public notices of these proceedings because they would be affected by Fermi 3. The NRC must reopen the licensing process for this purpose.

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