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RE: Addendum to Comments Regarding NUREG 2105

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Greetings:

After I sent in my comments, issues came to my attention that need addressing. The first is new evidence has come to light since your DEIS public meeting on Dec. 15, 2011 in Monroe, Michigan. An NRC Safety Panel has accepted several key publicly requested actions regarding safety at the U.S. Fukushima-style Mark 1 reactors. This information was published in the Federal Register on Jan. 3, 2012.

The NRC Safety Panel agreed to review emergency back-up power systems installed to cool densely packed high-level radioactive waste cooling ponds that sit six to ten stories up in the Mark 1 reactor buildings. In a letter (dated 12/13/2011) from Eric Leeds, NRS's Director of Office of Nuclear Reactor Regulation, to Paul Gunter of Beyond Nuclear, it is stated that "Spent fuel pools (SPF) are elevated to the top of the reactor building outside and above the rated containment structures without safety-related backup electric power systems to cool high-density storage of nuclear waste in the event of loss of grip power."

Whoa! Spent fuel is being stored on top of Fermi 2? Does Detroit Edison plan to put spent fuel rods from Fermi 3 on top of the reactor building? Therefore, the DEIS should not move forward until the NRC Safety Panel has dealt with the dangers of operating Fermi 2 without a backup cooling system, and other safety factors that may be proposed for Fermi 3.

Additionally, a document entitled "Information Sheet on the Enrico Fermi Unit 3 Combined Operating Licenses Environmental Review" that NRC representatives handed out at the Public Meeting in Monroe, MI on Dec. 15, 2011. On the back page, under Chapter 10 - Conclusions and Recommendations, the document states, "The chapter summarizes the impacts of constructing and operating two new reactors. It also weighs the costs...of the two new units."

What is that about? Surely it isn't some sort of "bait and switch" tactic that has something to do with "Due to the current limited guarantee authority, DOE has narrowed the remaining power facilities under consideration for loan guarantees to three applicants, which are planning to build a total of five reactors" (*Quarterly Nuclear Power Deployment Summary* Oct. 2011)? It is also suspicious that the USACE included this document as an enclosure in the public notice for their proposed permit.

The third issue is that the DEIS states that the USACE has partnered in the environmental review and signed off on it, and yet, the USACE's draft permit, LRE-2008-00443-1-S11 states, "The Corps has not verified the adequacy of the applicant's avoidance and minimization statement at this time." And "the Corps has not verified the adequacy of this mitigation proposal at this time" (p. 5). There is too much at stake to proceed without official verification.

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Call = B. Olson (6901)

Since the National Marine Fisheries Service in their NUREG 2105 Draft EIS comments stated, "Although anadromous fish resources and their habitats may be impacted by the activity, we do not have sufficient staff resources to engage in the review or consultation on this activity pursuant to the Fish and Wildlife Coordination Act." I looked up anadromous and it refers to types of fish that swim up to the rivers and creeks to spawn. To poison them on their way in is just evil. Well, the government could save taxpayers money by just closing all these agencies that can't differentiate right from wrong without a costly investigation.

A final issue is that the people of Walpole Islands First Nations were not contacted by either the NRC or the USACE regarding the impact of building Fermi 3. The NRC stated in the DEIS that they are Canadian and don't have to be included. Wrong. They live on unceded lands and have dual citizenship in Canada and the United States. In their role as American citizens, they have to be included in scoping process and for the possible impacts. The Walpole Island Heritage Center has contacted the Canadian government for help in preventing the licensing of Fermi 3.

The 1807 Treaty of Detroit states that all descendants of those tribes and bands have fishing, hunting, and gathering rights in southeastern Michigan **forever**. The pollution from Fermi 2 alone is a treaty violation. Many descendants of those treaty rights have signed on to my comments. I have their tribal affiliation listed with their names.

Therefore, we the undersigned, wish you to put the Fermi 3 licensing process on hold until all of these issues have been adequately addressed.

Sincerely,


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