## Fermi3CEm Resource

From: Ethyl Rivera [erivera1446@comcast.net]
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To: Fermi3COLEIS Resource

Subject: U.S. Draft Environmental Impact Statement for COL for Enrico Fermi 3 - NUREG-2105

Draft Environmental Impact Statement Comments Related to the Enrico Fermi Unit 3

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Comments:

The Draft Environmental Impact Statement for Combined License for DTE released by the Nuclear Regulatory Commission is so biased that it should not be considered a basis for license issuance. The stated mission of the NRC, "Protecting People and he Environment" and its stated purpose "to **independently regulate commercial uses of nuclear material, including nuclear power;**" have obviously been ignored as evidenced by this report as it appears to be a rubber stamp for DTE's Environmental Report rather than an independent evaluation.

That the public has been given only 75 days to read, analyze and comment on the document which has been in preparation for more than two years is not only insulting, but a reflection of the outrageous disregard of citizens' valid and serious concerns, only a few of which are mentioned below:

- Many of the assessments made of affected environments are based on outdated data, much of which was submitted by DTE and were substantiated by independent sources.
- Reports on 2007 water samples from within Lake Erie, 2008. leaks and spills of harmful substances such as chlorine, ethylene glycol, sanitary waste, diesel oil and grease and others were reported, but specifics on recent monitoring were not provided.
- Tritium, high sulfate and high chloride concentrations detected in wells
- The extremely high volumes of water to be taken from and then returned in much-decreased quantities and with higher temperatures to Lake Erie which has been under assault in the past 20+ years from Fermi 2 and DTE's nearly coal-fired facility
- Elevated concentrations of mercury and arsenic
- Numerous spills to groundwater and soil on Fermi 2 site
- Labor and employment statistics used 2006 and 2008 estimates... all of which have seen drastic changes since also affecting the projections used

Not contained in the report are reports by independent scientific experts which are highly critical of both the Fermi 2 and Fermi 3 designs.

The many lethal components in all nuclear reactors have been broadly painted as being contained and diminished in their effects through continuously improved technology. The fact that these elements (many with half-lives of thousands and even billions of years, are housed on site as highly radioactive waste which has no disposal possibility other than transfer to munitions manufacturers and armament distributors has not been covered in this report in a factual and truthful manner. The origin on these elements from the mines to the processing, preparation, and transport and the disastrous effects on the human and other biota along this entire route have been watered down.

The incidence of 45.5% increase in cancer deaths since 1988 when Fermi 2 began operating for those from birth to 24 (according to the CDC) has not been sufficiently reported. In he early 1980s the Monroe County cancer death rate was 36<sup>th</sup> highest of 83 Michigan counties... but by the early 2000s it had moved up to 13<sup>th</sup> highest.

The lack of reported monitoring on the many crops grown in the once-rich soils of Monroe County is noted with alarm. The deleterious impact of Fermi 1 and Fermi 2 are on the many farms and orchards and, ultimately, the food that is consumed by not only those in the County but beyond, is noticeably missing.

The numerous SMALL and MODERATE environment impacts which have been documented in the EIS have been explained away as unimportant, temporary, or to be effectively mitigated by DTE's future actions. They are not, however, evaluated and reported in their total cumulative effects. The resulting determination that they are negligible is a shame.

Others have cited the dangerous chain of disastrous consequences following technological or human failures and unforeseen events such as weather, earthquakes, or terrorism. While the EIS ascribes numerous mitigation measures and assurances by DTE that the experience acquired over the last 40 years is more than sufficient to negate any concerns of these occurrences, sufficient justification for constructing another dangerous plant alongside Fermi 2 with the potential for a double atomic "bomb" is not found.

The economic environment and the potential for jobs that have been cited as justification for approval are being used as excuses for this project. The estimates cited for electricity to be needed are grossly exaggerated. The potential costs in both financial and human terms, the irreversible loss of one of the nation's largest supplies of fresh water, and the serious threats to our children and future generations are not sufficiently covered in this report. That DTE and the NRC have collaborated to impose this terrible plan on the public in the guise of providing safe, clean, energy as stated in this report is not only a waste of our taxpayers dollars, but a misuse of our national institutions which were created to "protect people and the environment," not to continually expose us to one of the most dangerous developments of man's scientific endeavors.

On behalf of my family, friends, neighbors and the thousands of Michigan residents that are still unaware of this environmental injustice, I urge the NRC to reconsider its recommendation and deny the construction and operation of Fermi Unit 3.

Ethyl M. Rivera

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