

July, 2005

## **U.S. EPA Comments on Grand Gulf Draft EIS**

Below are key excerpts:

- “the document received an EC-2 rating, meaning that environmental concerns exist regarding aspects of the proposed project, and additional information needs to be provided in the Final EIS.”
- “The DEIS does not include an assessment of the energy needs for the addition of one or two nuclear power units at the Grand Gulf facility...EPA has concerns with this approach since it does not address the justification for the power plant addition in the early stage of project development, as well as skews the subsequent energy alterative [sic] analysis toward nuclear power under the second EIS, since the NRC would have approved the suitability under the ESP.”
- “all utilities planning on constructing additional nuclear units on current sites should plan on the contingency of having to store waste onsite for an extended period of time.”
- “scenario(s) should be added...that address the impact of an attack on a spent fuel storage cask using artillery shells at Grand Gulf and the resulting implications of a dose to plant personnel and the public.”
- “The 20-year horizon under the proposed ESP does not take into consideration unforeseen population growth and/or additional stressors on air or water resources. Typically, an action which has not occurred within five years of an EIS requires a re-evaluation to determine whether significant changes have occurred, and whether a supplemental EIS is required prior to the action proceeding.”
- “The Grand Gulf Site is located in Claiborne County which has both the highest minority and low-income populations.”
- “While it is important to map all of the potential EJ areas in a 50-mile radius of the site, it would also be helpful to show in more detail the EJ areas that could face the most significant risk. For example, provision of GIS or aerial maps of EJ populations within close proximity to the Grand Gulf site (i.e., 0-5 miles) would be useful.”
- “Given that there are significant EJ populations in an area rich in fishing and hunting resources, one would assume that subsistence practices do exist...Were independent organizations, (e.g., a university experienced with this specialized capability of researching subsistence), utilized in this analysis, and were there public meetings held with subsistence living as a topic of discussion with potentially impacted EJ populations?”

- “it appears that some local, municipal infrastructure and emergency services within Claiborne County may not be adequately prepared for potential accidents, additional influx of workers, etc.”
- “Many of the residents within the immediate project area are low-income, and may not have much capacity to easily move away from their local community if they consider the additional nuclear power facilities unacceptable neighboring property.”
- “Based on the DEIS, it is unclear to what extent the public is involved in the proposed project, particularly the EJ populations that reside in close proximity to the site.”
- “the document does not give information regarding: types of efforts made to incorporate the EJ populations throughout the decision-making process; evaluating whether the EJ populations that currently reside both in close proximity and within the sphere of potential effect have a good relationship with the existing facility; whether the existing facility has been a good neighbor; whether there been [sic] any problems with current facility [sic] which have generated public concern; whether residents in close proximity are employed by the nuclear facility; and whether local residents are supportive of the proposed expansion? If the residents have concerns, how are they being addressed? For example, the DEIS does not mention the legal challenge filed by a coalition of citizens groups objecting to the project, nor does the document mention any efforts to communicate with potentially impacted EJ communities to address their concerns. This information should be incorporated into the FEIS.”
- “Based on the DEIS, it is unclear where the radioactive waste from the Grand Gulf Reactors will reside.”
- “The DEIS does not address the vicinity in radius miles that would be affected by a worst case accident scenario and a credible case accident scenario...It selects what appears to be arbitrary 10km and 80km boundaries for its discussion related to persons that would be affected by the siting of one or more additional nuclear power facilities.”
- “The DEIS also does not address the following issues: a description of what kinds of accidents are potentially possible; the computer models used to ascertain potential release scenarios; the environmental health effects of an aftermath; the detailed capacity of the local, state and federal communities to react to such accidents (e.g., Local Emergency Planning Councils, fire departments, federal agencies) in explicit terms; and what track record the facility currently has as to accident prevention.”
- “the discussion should be expanded on the Police, Fire and Medical capabilities in more detail. It is clear that there are already serious deficiencies in response capacity.”

- “The DEIS should incorporate more information on environmental and health-related cumulative effects...There is no discussion about the cumulative environmental impacts from chemical facilities, together with these existing and proposed additional nuclear power facilities.”