

American Environmental Health Studies Project * Citizens' Environmental Coalition *Center for Health, Environment & Justice * Concerned Citizens of Seneca County * Nuclear Information and Resource Service * people's Environmental Network of NY * , Peace Action of Central New York
January 2011

Climate Action Plan
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Re: Comment on the New York State Climate Action Plan Interim Report

We are writing to express our concern and opposition to the nuclear reactors proposed in the Climate Action Plan. We strongly believe that New York State should pursue Long Term Sustainability in relation to all policy decisions, but this is even more true for Climate Change, where sustainability is essential.

Nuclear Technology is Unsustainable. Technology that has long term unsolved technical problems such as what to do with high level radioactive waste cannot be considered sustainable. Technology that has the potential to cause severe irretrievable and irreparable harm can also not be considered sustainable.

There was no factual analysis of nuclear energy that explored the environmental impacts over the entire life cycle of nuclear energy and radioactive waste, which must be properly managed for thousands of years. Looking only at carbon emissions and costs, the Interim Report uses the oxymoron of "safe nuclear" and includes nuclear reactors in the vision of a "Clean Energy Economy".

I New York is recommending that multiple new nuclear reactors be built when nuclear energy is completely unsustainable over the long term because:

- Financial costs are so extraordinarily high compared to other energy sources that Wall Street and private investors will not invest.
- Nuclear reactors will only be built with multiple subsidies from the public- taxpayers and consumers of electricity will bear the burden.
- New York already has some of the highest electric rates in the nation and given NY's budget deficit, the state is not able to provide nuclear subsidies without taking money away from other essential services. The unemployed and those with low incomes will suffer the most.
- Investments in nuclear energy will take money away from energy efficiency, and clean renewable energy programs, reducing the total number of jobs created in NY. As the Interim Report for the Climate Action Plan documents, energy efficiency and renewable energy are

the most cost-effective policy options (more than 4 times cheaper) for achieving greenhouse gas emission reductions.

- Nuclear reactors generate radioactive waste --20 -30 tons of high level nuclear waste per year per reactor. The nuclear waste problem has remained unsolved for over a half century. There is no federal repository for high level nuclear waste--- in fact, no country in the world has one.
- New York is also home to many nuclear waste sites, including the West Valley former reprocessing site, which threatens the Great Lakes and drinking water for millions of people. Adequate funds for the federal portion of the West Valley cleanup have not been forthcoming, causing extraordinary delays. Federal irresponsibility related to nuclear waste and contamination is intolerable when simultaneously billions of dollars in subsidies are being offered for new nuclear reactor construction. This puts New York at future risk for health and environmental harm as well as financial liability for cleaning up nuclear wastes.
- The risks of catastrophe at nuclear plants are high with aging reactors and spent fuel being stored on-site.
- Because long term storage of radioactive waste has not been solved, spent fuel rods are continuing to be stored at nuclear reactors, increasing accident and terrorism risks. A National Academy of Sciences study showed that the cooling pools at nuclear reactors— with 10 to 30 times more radioactive material than in the reactor core—are subject to terrorist attacks, which could cause an inferno and release a massive amount of deadly radiation.
- Nuclear Power is not necessary to address Climate Change.

Recently a *Sustainable Transition* was proposed:

1. Retiring all coal plants (rather than invest in Carbon capture and sequestration)
2. Building no new nuclear reactors
3. Closing existing nuclear reactors (28%) capacity by 2050.

The environment benefits, pollution reductions and cost savings of the proposed Sustainable Transition are extraordinary. CO2 levels fall by 55 billion tons, 82% relative to 2010 levels. (The “Business as Usual” plan would increase them by 770 million tons).Mercury and Sulfur dioxide emissions fall nearly 100%. Emissions of Nitrogen oxides, a gas that can irritate your eyes, nose, lungs, and also contributes to ozone pollution, falls by 60%. Water consumption, needed in the production of coal and nuclear power, falls by over 710 billion gallons. Total Net Savings in 2050 are \$13 Billion, compared to “Business as Usual”.

www.synapse-energy.com

- As part of NY's Climate Planning efforts various scenarios (5) were examined to get costs per ton of CO2e reduced with energy efficiency, renewables and nuclear. Notable problems occurred with this analysis-- the capital costs were assumed to be just \$4091 per kW , when actual current costs are twice that. Of 5 scenarios, only 1 included energy efficiency(#2). The Climate Action Plan is proposing major efforts to expand energy efficiency, so why examine 4 scenarios without it? Scenario #2 with energy efficiency and renewables had the lowest costs per ton of CO2e reduced. Apparently the only way to propose nuclear plants is

to eliminate energy efficiency, because with energy efficiency New York just doesn't need new nuclear plants. When nuclear energy is included costs per ton are 4 times higher (even using capital costs at half of what they should be.) See Annex 2, NYS Power supply and Demand Policy Option Document Quantification Annex for capital costs and scenario analyses. <http://www.nyclimatechange.us/ewebeditpro/items/O109F24276.pdf>

II A Clean and Sustainable Energy Future cannot be built on Unsustainable Policy options to Address Climate Change.

In order for New York State to build a Clean and Sustainable Energy Future and address Climate Change, We :

- Support a moratorium on new nuclear reactors and plan for a phase out of existing ones, necessary especially because of the absence of a waste repository. Eight other states have adopted a moratorium or other policies that prevent new nuclear reactors from being built. Illinois, Minnesota, Kentucky, West Virginia, Wisconsin, Hawaii. Missouri and Iowa have prevented the nuclear industry from charging upfront fees to consumers while new reactors are being built, thus discouraging new reactors. Arizona beat back an attempt to define nuclear as renewable energy. Vermont voted to shut down the Vermont Yankee reactor in 2012.
- Oppose financial support or any facilitation leading to the construction of nuclear reactors.
- Support measures to address Climate Change primarily through ambitious energy efficiency and clean renewable energy, which your own analysis shows are the most cost-effective energy options.
- Support Expanded Energy Efficiency efforts to achieve 30% by 2030.
- Support Expanded Clean Renewable Energy to achieve 60% by 2030.
- Support an expanded Clean Renewable Energy Portfolio Standard (CRPS) of 60% by 2030.
- Oppose a Low Carbon Portfolio Standard LCPS as a replacement for the Renewable Portfolio Standard. A LCPS would require utilities to purchase a fixed percentage of low carbon fuel which would include nuclear energy or other dirty energy sources.
- Oppose a Siting Policy for new Power Plants that is Fuel and Technology Neutral. Such a policy would encourage the development of the dirtiest and most environmentally damaging power plants.
- Support demands on the federal government to allocate adequate funds to clean up existing nuclear wastes and contamination in New York State, rather than support the creation of more nuclear waste by subsidizing more reactors.
- Support a Citizens Utility Board, which would provide a means to increase democratic participation for the public including expert technical assistance on energy, climate change,

and consumer costs. Costs are particularly important for low income consumers. Industry has dominated for far too long and some measure of balance must be instituted to protect the broader public interest.

Sincerely,

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