



Carbon Free, Nuclear Free Wisconsin Coalition

Via Sierra Club-John Muir Chapter
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Dear Wisconsin State Legislators,

We are writing to ask you to please oppose bills moving forward that would remove Wisconsin's commonsense protections against the high cost of constructing nuclear reactors, and the costs and risks of permanent storage of radioactive waste in Wisconsin. The Assembly is expected to vote on AB384/SB288 on Tuesday, January 12. Our organizations collectively represent tens of thousands of Wisconsinites from across the state. Our members are increasingly concerned with our energy choices and the risks associated with the potential for a nuclear waste storage site in Wisconsin.

Wisconsin's Chapter 196.493 is NOT a moratorium on nuclear power. Rather, it simply states that before a nuclear plant can be built, a utility must prove:

"A federally-licensed facility ... with adequate capacity to dispose of high-level nuclear waste from all nuclear power plants operating in this state will be available, as necessary, for disposal of the waste;"

and

"the proposed nuclear plant, in comparison with feasible alternatives, is economically advantageous to ratepayers" in terms of fuel supply, costs for construction, operation, decommissioning, nuclear waste disposal, and any other economic factor."

These commonsense standards protect Wisconsin ratepayers from excessive electricity costs and the risk of having indefinite nuclear waste storage sited in our communities. Removing these protections will put Wisconsin communities at risk and negatively impact all Wisconsin taxpayers.

Nuclear power has benefited from over \$140 billion in federal subsidies over the last 50 years, from liability protection to loan guarantees.¹ New nuclear plants are extremely expensive and cost overruns are frequent. The most recently approved nuclear plants are a perfect example. The Toshiba-Westinghouse AP1000 reactors under construction at Southern Company's Plant Vogtle in Georgia and SCANA's VC Summer plant in South Carolina prove this. Each have 2 new reactors under construction. Both are at least 39 months delayed (first units were to be online in April 2016) and are billions of dollars over budget. Plant Vogtle was originally estimated to cost approximately \$14.1 billion for the two reactors and is now on track to cost nearly \$21 billion.

¹ Environment America Research and Policy Center, "The Nuclear Bailout: President Obama's High Risk Gamble on New Nuclear Reactors Undermines the Fight Against Global Warming," 2010, page 45.

Even John Rowe, former CEO of Exelon, which owns and operates the largest nuclear fleet in the country, has repeatedly stated that nuclear is not a good choice for future electricity generation, due to the high cost of new reactors.²

Some support for this idea has been resurrected out of the need to find a low- or carbon-free fuel source to reduce Wisconsin's carbon emissions in order to comply with the Clean Power Plan and address the serious threat of climate change. Nuclear power will not address these concerns in a timely matter. New plants take at least 10-15 years for construction and licensing,³ and are still years from completion and operation, making the technology too slow to play a significant role in compliance with the Clean Power Plan. Even if the process could be sped up, there are far less expensive ways to meet Wisconsin's carbon reduction goals.

A recent report by Dr. Arjun Makhijani⁴ explains:

An objective assessment of the facts leads to the clear conclusion that nuclear power is already economically obsolete, quite apart from a number of other considerations. The same amount of money can produce far greater CO2 reductions with wind and solar energy than with nuclear. The time-related financial and climate risks (delayed, costly, and cancelled plants) of nuclear power also point in the same direction.

Removing Wisconsin's ratepayer protections from the exorbitant cost of nuclear reactors could have much more severe unintended consequences. If passed, this could send a strong message to the Department of Energy (DOE) that Wisconsin is open to hosting a nuclear waste repository. In the 1980s the DOE ranked Wisconsin's Wolf River Batholith as Number Two for a second high-level nuclear waste repository.⁵ A 2008 DOE Study on the Need for a Second Repository⁶ listed Wisconsin as one of the top potential states based on our granite geology. After the cancellation of the potential Yucca Mountain repository, the DOE is desperate to find an alternative. Further, even if Yucca Mountain had opened, it is not large enough to store the nuclear waste generated by the current fleet of nuclear reactors, let alone any new reactors.

The Wolf River Batholith has long been talked about as a possibility for this alternative. The proposed area would be located somewhere within a 1,000 square mile watershed that extends over seven counties, including Langlade, Shawano, Waupaca, Menominee, Portage, Marathon and Oconto counties, and the land of three tribes (Stockbridge-Munsee, Menominee and Ho-Chunk).

Groundwater movement in the granite could carry harmful radioactive contaminants into drinking water. This contaminated water could then flow from the Wolf River into the Fox River, which connects to Lake Winnebago and into Lake Michigan near Green Bay, putting many people in this area at risk.

² World Nuclear News, "Economics hinder US new build", August 16, 2011. Mr. Rowe also stated this in his keynote speech at the UW-Nelson Institute Earth Day event in Madison, on April 20, 2011.

³ Arjun Makhijani, PhD, "Assessing Nuclear Plant Capital Costs for the Two Proposed NRG Reactors at the South Texas Project Site," Institute for Energy and Environmental Research, March 24, 2008.

⁴ See <http://ieer.org/wp/wp-content/uploads/2015/10/Nuclear-Power-and-Low-Carbon-Alternatives-Nuclear-Fuel-Cycle-Royal-Commission-1-Oct-2015.pdf>

⁵ Quincy Dadisman, "3 areas in state cited as likely A-waste sites," *Milwaukee Sentinel*, March 9, 1984; Dames and Moore, *Crystalline Intrusions in the U.S. and Regional Geologic Characteristics Important for Storage of Radioactive Waste*. Cincinnati, OH, December, 1979.

⁶ See http://www.energy.gov/sites/prod/files/edg/media/Second_Repository_Rpt_120908.pdf.

This proposal has been opposed historically in Wisconsin. In a 1983 statewide referendum, 89% voted against a nuclear waste disposal site in Wisconsin.⁷ Part of the reason for the cancellation of the Yucca Mountain site was the opposition from the State of Nevada. States across the country have passed laws banning the construction of new reactors and others are quickly moving into a clean energy economy that does not include nuclear. It may not bode well to have Wisconsin, already Number Two on the list for a repository, send a strong pro-nuclear message to the Department of Energy.

Wisconsin has an opportunity to be a leader in the truly clean energy economy. We know that you care about creating family-supporting jobs, protecting the health of our citizens, and sustaining our natural resources. We do as well. We urge you to oppose any bills that weaken or eliminate Wisconsin's cost and waste safeguards for nuclear reactors, and support energy policies that help us realize our clean energy potential.

Sincerely,

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⁷ Wisconsin Blue Book, 1983-1984, p. 875. Ballot Question: "Do you support the construction of a national or regional high-level radioactive waste disposal site in Wisconsin?"