## Fermi3CEm Resource

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To: Fermi3COLEIS Resource

Subject: Comment on Fermi 3 DEIS NUREG-2105

Fermi comment January 11, 2012

Draft Environmental Impact Statement for Combined License (COL) for Enrico Fermi Unit 3

report number: NUREG-2105

http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr2105/

The DEIS for the Enrico Fermi Unit 3 is incomplete, with the following omissions:

- 1. Failure to perform a detailed and comprehensive analysis of the chemical content of water being supplied from Lake Erie. The analysis referred to here is one that would be conducted on the water to determine its chemical content <u>prior</u> to being treated for use as cooling water. Please see pages 3-30 through 3-34 of the Draft Environmental Impact Statement for the COL for Enrico Fermi Unit 3 NUREG-2105 Vol.1.)
- 2. Because the chemical content of the cooling water is unknown, there is also a failure to predict the chemical and particulate content of the water vapor that will be emitted from the cooling towers.
- 3. Because the chemical content of the water vapor emitted from the cooling towers is unknown, there is also a failure to analyze the environmental impact of the contents of the water vapor emitted from the cooling towers. The environmental impact cannot be assessed if the chemical content of the drift from the towers is unknown. The total dissolved solids in the drift water were assumed to be salt (see pages 5-18, 5-91, 5-138 of the Fermi 3 DEIS). Such an assumption does not constitute a science-based analysis of the actual conditions and completely fails to consider the impact of other chemicals in the drift, many of which could be far more environmentally destructive than salt and could appreciably contribute to the PM2.5 emissions from the cooling towers. On page 7-13 DEIS Fermi 3, there is a brief discussion of the industrial pollutants that are acknowledged to be in the waters of Lake Erie. However, the rest of the document assumes that these pollutants do not exist and does not address their potential environmental impact as cooling tower drift.
- 4. Failure to analyze the impact of the addition of decomposing dead aquatic life that would be returned to Lake Erie. The aquatic life is caught on screens, and then returned to the lake. This is the equivalent of fertilizing the water in the lake. No environmental impact has been provided for this addition of nutrients to the lake and the surrounding shoreline. (Please see page 3-11 and ch. 7 Cumulative Impacts DEIS Fermi 3.)

Submitted Jan. 11, 2012,

Lisa Kasenow

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