

LEAF



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NYSERDA

**Comments on
Blueprint for Consideration of Advanced Nuclear Technologies
From the Ramapough Lunaape Nation and LEAF of Hudson Valley**

I am submitting these comments on behalf of the sovereign Ramapough Lunappe Nation and LEAF of Hudson Valley, in strong opposition to NYSERDA's proposed Blueprint for Consideration of Advance Nuclear Technologies for New York State the following reasons:

The claimed reasons for consideration of advance nuclear technologies to be allowed in New York State are factual untrue

1. **Nuclear Energy is not a solution to climate change**, but is a significant part of the climate change problem.
2. **Nuclear is Not Emission Free** - emits large quantities of thermal pollution for long periods of time. Unlike fossil fuel which burn once and then are cold ash, nuclear fission burns hot for decades and centuries. Nuclear waste heat impacts on climate change have not been considered.
3. **Nuclear is Not Carbon Free** - nuclear reactors make new carbon atoms. It is the only human activity that increases the amount of carbon on the planet. These new carbon atoms are radioactive – carbon14, which are . released as radioactive CO2 (C¹⁴O₂) and Methane (C¹⁴H₄). These are known carcinogens and climate change accelerators. Radioactive CO₂ and methane impacts on climate change impacts are unconsidered. Only after full consideration of the impacts of this newly produced radioactive active carbon has

been studied can there be any consideration of allowing siting of any new nuclear technologies New York State. Failure to identify or consider these impacts violates both SEQRA and NEPA.

4. **Nuclear is Not Greenhouse Gas Free** - nuclear reactors continually release radioactive vaporized tritium, those white cloud around nuclear reactor stacks Nuclear releases other greenhouse gases, including: radium hexafluoride (UF₆), Krypton-85. and Xenon-133 (Xe-133).

All of these radioactive greenhouse gases are all climate change disruptors and accelerators. Exponentially more potent than CO₂ emitted from burning fossil fuels. In the 1970's the International Atomic Energy Commission and U.S Atomic Energy Commission warned that by the 2020's these radioactive chemicals could disrupt the electron magnetic balance, resulting in increased size, strength and frequency of storms. Despite this warning no additional studies appear to exist. Until the impact of radioactive greenhouse gases emitted from nuclear reactors is considered – New York should not consider restarting closed reactors or building any new nuclear reactors or technologies until the impacts of radioactive greenhouse gases emitted from nuclear reactor is fully studied. Failure to identify or consider these impacts violates both SEQRA and NEPA.

5. **Cost benefit analysis does not support continued support of nuclear energy.** The recent International Energy Agency report clearly shows that nuclear energy is not sustainable economically and that support of sustainable renewable energy is economically and fiscally responsible. New York State cannot justify using New York State financial resources to support nuclear technologies which are not supported by cost benefit analysis.

IEA: Renewables 2024: Analysis and forecast to 2030, International Energy Agency report, Oct 9, 2024. <https://www.iea.org/reports/renewables-2024/electricity>, or <https://iea.blob.core.windows.net/assets/17033b62-07a5-4144-8dd0-651cdb6caa24/Renewables2024.pdf>

6. **We are calling on NYSERDA to end the uneven financial playing field which greatly favors nuclear over renewable, clean, sustainable energy systems.** Undue political influence by the fossil fuel and nuclear industry lobbies have resulted in these dirty, dangerous and deadly energy systems from receiving the lion's share funding. This bias has slowed and prevented New York's transition to a clean, sustainable energy future in a timely manner. In 2016 NYSERDA allocated \$7.6 billion to bolstering aging, time limited nuclear reactors in upstate New York, while only allocation \$1 billion for all renewables -solar, wind, geothermal, storage and efficiencies statewide. Given this disparity it is not surprising that renewable have not come on line quicker

New York's highly skewed allocation of funds must end, so that New York can build a sustainable energy future. now!! If the funding in 2016 has been evenly distributed between renewable/sustainable energy systems New York would be well on its way to its goals of clean sustainable energy.

Doubling down and continuing to give funds to the most expensive, dirty, dangerous and deadly energy, nuclear, is detrimental to building clean energy future for New York. Continuing to do what has not worked over and over again, is the definition of insanity - we are calling on NYSERDA to stop favoring nuclear over clean, sustainable energy .

7. **Nuclear Waste Problem:** Prior to any consideration of advanced nuclear technologies including small module reactors (SMRs) New York State must first figure out how it is going to manage the tons of nuclear waste already existing in New York State at Indian Point, Fitzpatrick, R.E. Ginna, Nine Mile Point and West Valley. It is irresponsible, dangerous and economically unsustainable for NYSERDA to promote the production of even more nuclear waste without a plan to deal with the nuclear waste that the state is already burdened, which endangers the health and safety of millions of people and the waters of the Hudson River and Lake Ontario..

Continuing to make nuclear waste without first having a viable plan to manage already existing nuclear waste in New York State is the definition of insanity and cannot be reasonably and rationally considered.

Of all states, New York, and of all agencies, NYSERDA, should be well aware of the enormous environmental and economic danger nuclear power poses to our residents, resources and budget.

The latest estimate for full clean-up of the West Valley nuclear waste site in Western New York, owned by NYSERDA, was \$10 Billion in 2010. Nuclear power waste from the 1960s and 70s was brought to West Valley in Western NY from across the country and Puerto Rico for reprocessing and disposal, which failed, and is nowhere near cleaned up.

New York must regularly pay itself for and beg for federal support to keep the site from getting worse and for efforts to "clean up." Because NYSERDA is so beholden to the federal Department of Energy for cleanup efforts, the state reduces its own standards, just so some movement continues toward cleanup of this over-60-year old nuclear power waste. This is unacceptable.

The massive inventory of long-lasting and intensely radioactive waste, largely from nuclear power in the 1960s and 70s, seriously threatens the Great Lakes and sole source aquifer. The Report on nuclear waste shipped to West Valley for

reprocessing (1966-1972)— does NOT include sources of the commercial and government waste that went to West Valley for burial in the State Licensed 14 trenches/ditches (1963-1975)

[Revised "Plutonium Recovery from Spent Fuel Reprocessing by Nuclear Fuel Services at West Valley, NY from 1966 to 1972."](#)

More nuclear power in New York State means more high-level and so-called "low-level" nuclear waste and routine radioactive releases into the air, water, soil, food web and bio-regions.

The waste from the first nuclear power in the nation's history still has not been isolated –thus it is highly irresponsible and negligent for New York State officials and NYSERDA even consider making more?

NYSERDA Clean up New York State's nuclear mess before making an even bigger mess!

The Brattle Report, upon which NYSERDA appears to be relying on completely ignores this serious problem. NYSERDA nuclear power legacy liability.

We point out that although the Brattle Group claims to be independent, it is actually a biased lobbying arm of the nuclear industry and cannot be relied upon by New York State. We call on NYSERDA to conduct additional independent studies before any additional consideration is given to so called "advanced" nuclear technologies. .

For of the reasons set forth above – New York State and NYSERDA should not be wasting New York State taxpayer and ratepayer resources to develop and plans for "so-called" Advanced Nuclear Technologies.

To be clear nuclear energy is a dated technology which has no place in New York State's energy future. Today sustainable, clean renewable energy is available and ready to be implemented but needs adequate funding. It is time for New York to stop funding dirty dangerous nuclear energy and use our financial resources to benefit new York's today and tomorrow.

Once again it is improper for NYSERDA and any New York State agency to approve additional funding for nuclear without first conducting a cost-benefit analysis which include storage and management of nuclear waste, the cost of health impacts from nuclear energy emissions and the cost of climate change impacts of nuclear heat waste and radioactive greenhouse gases.

It is irrational and irresponsible for NYSERDA to consider any form of nuclear energy within New York State, as to prevent New York State from building a clean, sustainable, safe energy future.

Nuclear energy has no place in New York's energy portfolio

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Susan Shapiro', with a stylized flourish at the end.

Susan Shapiro, Director
LEAF of Hudson Valley.