



Via Electronic Submission to
Draftblueprint@nyserda.ny.gov

November 8, 2024

Ms. Doreen Harris, President and CEO
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, New York 12203

Re: Comments on NYSERDA Draft Blueprint for Consideration of Advanced Nuclear Technologies

Dear President and CEO Harris:

Thank you for the opportunity to provide these comments on the Draft Blueprint.

Grassroots Environmental Education is a national science-based environmental health non-profit in New York serving local and state governments, school systems, environmental and civic organizations and health professionals. Our mission is to educate the public regarding the link between environmental exposures and human health. Grassroots develops evidence-based educational programs, resources and solution tools in consultation with a network of leading medical and scientific experts.

NYSERDA's Draft Blueprint fails to consider myriad critical environmental, health, safety and economic factors:

While the CLCPA provides procedures for strong public input, which include public hearings, public comments and consultation with the Climate Justice Working Group, established for the purpose of advising the Climate Action Council, NYSERDA and this Blueprint utterly failed to provide any meaningful opportunity for public input. This is especially disturbing given the complex environmental, health and fiscal issues that are involved but are not addressed. Although after much public pressure, an initial very limited 30-day public comment period was extended by an additional 30 days to November 8, this remains woefully inadequate, given the importance to New York's climate and energy policy and public health, environmental, safety and budget impacts.

More time is needed for a fully inclusive public participation process that includes comprehensive assessment and process involving the Department of Environmental Conservation, the Department of Health and immediately halts the Public Service Commission's inappropriate modeling of new nuclear before a judicious and comprehensive process is completed. Specific outreach to and engagement with New York's Disadvantaged Communities is a mandated component of that process.

The NYSEERDA Blueprint failed to comprehensively assess the economic, health, environmental, security, safety, opportunity costs and community impacts of nuclear technologies. Furthermore, the Blueprint failed to determine the role of nuclear reactors in actually achieving 100% zero-emissions electricity by 2040. Where is the estimate for the percentage of "emissions free" electricity goal that could be achieved by nuclear technology and the alternatives? And what are the costs, especially given the "long history of substantial cost overruns" of the nuclear industry?

Stanford University Professor Mark Jacobson's testimony to the U.S. House of Representatives this past January, titled "*Seven Reasons Why New Nuclear Energy is an Opportunity Cost That Damages Efforts to Address Climate Change and Air Pollution*" states, "...New nuclear electricity costs about 3-14 times that of onshore wind per unit electricity generated. Nuclear also takes 7 to 21 years longer between planning and operation than wind, and produces, 9 to 37 times the emissions per unit electricity generated as wind. In addition, nuclear creates risk and cost associated with weapons proliferation, core meltdown, underground uranium mining lung cancer, radioactive waste, and carbon-equivalent emissions. Thus, nuclear has seven major problems. Clean, renewables avoid all such problems."

<https://web.stanford.edu/group/efmh/jacobson/Articles/I/24-01-MZJ-HRTestimony.pdf>

The Blueprint fails to consider the CLCPA requirement that all state agencies "shall not disproportionately burden disadvantage communities," even though these severely overburdened environmental justice communities have been perpetual sacrifice zones in close proximity to the entire life cycle of nuclear energy. That omission fails to comply with New York law and cannot be disregarded. A full assessment must be conducted, which includes input from the Climate Justice Working Group and impacted environmental justice communities.

The entire life cycle of nuclear energy poses serious health and environmental threats, especially to communities living in proximity to the harmful radioactive and toxic exposures, which are associated with cancers, birth defects and reproductive damage.

We know for certain that nuclear energy is not a climate solution. Indeed, it is part of the problem. Nuclear reactors make new carbon atoms, which are radioactive, known as carbon 14. Released as radioactive CO₂ and methane, these emissions contribute to the climate crisis and are also known carcinogens. Reactors continually release radioactive tritium and other greenhouse gases including radium hexafluoride, Xenon-133 and Krypton-85. Nuclear energy also emits vast quantities of thermal pollution for long periods of time.

NYSERDA failed to consider that more nuclear energy would cost New Yorkers billions of dollars in higher energy bills and generate massive amounts of radioactive pollution. New Yorkers have already foot the bill for nuclear bailouts eight times since the 1970s. Just last year, New Yorkers paid \$530 million to bail out old nuclear power plants. That's almost 30 times more than the cost of expanding renewable energy.

NYSERDA and all state agencies are clearly well aware of the immense environmental and economic danger nuclear power poses to New Yorkers, resources and budget. The latest estimate for full cleanup of the West Valley nuclear waste site in Western New York, which is owned by NYSERDA, was \$10 Billion in 2010. Nuclear power waste from the 1960s and 1970s was brought to West Valley from across the United States and Puerto Rico for reprocessing and disposal, which failed, and is far from being cleaned up. In fact, West Valley is one of the most contaminated sites in the country.

Furthermore, New York State must continually pay for clean up efforts and plead for federal funds to keep the West Valley site from getting even worse. The state actually reduced its own cleanup standards just so some movement continues toward cleanup of this over-60-year old nuclear power waste.

Despite active containment, the massive inventory of long-lasting and highly radioactive waste, primarily from nuclear power facilities in the 1960s and 1970s, continues to seriously threaten the Great Lakes and sole source aquifer. The Report on nuclear waste that was 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.”**
<https://www.nrc.gov/docs/ML1219/ML12194A610.pdf>

Adding more nuclear power will increase high-level and so-called “low-level” nuclear waste and routine radioactive releases into our air, water, soil, and ecosystems. Toxic radioactive waste from the first nuclear power in the nation's history has yet to be addressed. And, indeed, is our state's liability. How can New York State and NYSERDA even contemplate the idea of allowing new nuclear energy producing even more toxic radioactive waste when this 60- year old West Valley mess has not been cleaned up? New York State cannot continue to ignore this NYSERDA nuclear power legacy liability.

NYSERDA appears to be relying on the Brattle Report, which completely ignores this serious problem. Although the Brattle Group claims to be independent, it is actually part of a biased lobbying arm of the nuclear industry. It is imperative that NYSERDA conduct independent, transparent and comprehensive assessments before any consideration can be given to so called “advanced” nuclear technologies.

In closing, it's time for New York State to stop chasing down false solutions and squandering New Yorkers' time and money by considering nuclear energy. It is an exorbitant and inherently dangerous technology which relies heavily on taxpayer

subsidies, generates toxic radioactive waste that lasts for thousands of years, poses serious public health and environmental risks, and severely overburdens environmental justice communities that have been perpetual sacrifice zones in close proximity to existing nuclear reactors, uranium mines, enrichment sites and nuclear waste dumps. The Draft Blueprint disregards any consideration of the harmful exposures to known carcinogens, teratogens and mutagens associated with the entire nuclear life cycle and fails to address the CLCPA requirement that all state agencies 'shall not disproportionately burden disadvantaged communities.' Wasteful investments in too-slow-to-build nuclear facilities significantly impede investments in the urgently needed rapid and cost-efficient transition to proven renewable energy solutions that work now, and will allow New York to meet its CLCPA goals without endangering the health and safety of New Yorkers and further burdening taxpayers with these insurmountable costs.

Respectfully submitted by,
Ellen Weininger
Director of Educational Outreach