



COPPER COUNTRY ALLIANCE

HC 60 Box 306T
Copper Center, Alaska 99573
Phone (907) 822-3644
cca@coppervalleyak.net

a 501(c)(3) non-profit corporation

*"Protecting the rural and wild natural environment of the
Copper Basin/Wrangell Mountains region."*

May 9, 2023

Rebecca Colvin
ADEC Division of Environmental Health
By email to rebecca.colvin@alaska.gov

Re: Proposed regulations on nuclear facility siting

Dear Rebecca Colvin,

Copper Country Alliance (CCA) is a volunteer grassroots 501(c)(3) organization that addresses conservation issues in the Copper Basin. Most of our members are Copper Basin residents and are Copper Valley Electric Association (CVEA) members/customers. CVEA's service area includes Valdez in addition to the Copper River Basin. Ultra Safe Nuclear (USNC) approached CVEA with the proposal to site a micronuclear plant in CVEA's service area. After various studies were done, two potential sites were proposed for Valdez. By the end of the summer, CVEA and USNC will either agree for CVEA to purchase power from a USNC owned facility, or not.

Our board spent many hours finding and reading highly credible sources, and we have concluded that micronuclear energy is not cost-effective and poses considerable health risks. Although we are submitting comments on your proposed regulations, we would still urge DEC to disallow micronuclear plants in Alaska. Our members are concerned about this potential nuclear project for several reasons, including:

- 1) We want our dependence on CO₂-releasing diesel plants to end, because of our deep concerns about climate change's harm to communities, fish, and wildlife, but we want an energy source that is truly sustainable and with a full life-cycle contribution to climate change that is lower than other alternatives. A micronuclear plant would be neither of those things.
- 2) We are deeply concerned about the harm that uranium mining and radioactive waste disposal does to other communities. We are also worried about the potential for nuclear accidents when radioactive materials are moved through the Copper Basin on its way to Valdez, and the potential dangers to Valdez residents and visitors.

18 AAC XX.100. Pre-application requirements:

More inclusive public notice should be required, because the public has more varied sources of information than it did just a few decades ago. This is important if the regulations are to "promote local involvement."

- Even though these proposed regulations deal only with facility siting, a facility would require radioactive materials moving to and from the site. It would be unreasonable to approve a site without residents along the travel route being aware of the proposal and being able to comment on the site. Therefore, notice should be required to communities along the route, as well as the area where the facility would be sited.
- The entire service area of a utilization facility should receive notice. (In our case, that means the CVEA service area.)
- Notice should be given not only in a "newspaper of general circulation" but also in local newspapers, if there are any. Residents of the Copper River Basin and Valdez, for instance, have inexpensive access to the *Copper River Record*, whereas the "newspaper of general circulation" could be interpreted as *Alaska*

Daily News, which is not delivered out here. Online subscription is fairly expensive compared to the *Record*.

- Newspaper notices should be required to be prominent. Small “legal notices,” in black and white are easily overlooked.
- Public announcements should be made on all radio stations in the service area (there are three in the CVEA service area) and along the route.
- The public notice should identify the route and means of transportation of radioactive materials to and from the facility.

18 AAC XX.200. Application requirements:

- The applicant must discuss its plans for emergency response and surveillance, including who would provide these services and who would pay for them.
- The applicant must include a state-approved and federally-approved plan for handling of, and long-term storage of, nuclear waste.

18 AAC XX.220. Public notice procedures:

- The department should allow at least **90** days for public comment. Documents of this sort can take a long time for busy members of the public to read and comment on.
- Please incorporate the notice requirements we urged in Pre-application requirements, above.

18 AAC XX.300. Location requirements for a micronuclear facility.

- How did you decide upon the various separation distances?
- We now realize that “100-year floodplains” are no longer dependable. With the advent of climate change, floods are occurring as much as a couple times a decade within “100-year floodplains.” We urge you to re-evaluate the issue of flooding.
- A microreactor facility should not be located closer than 2,700 feet from any wildlife habitat area, national wildlife refuge, national monument, or national park. This is the same distance required between a microreactor facility and any residence. Many wildlife species are as vulnerable to radiation as are humans but would lack the knowledge of the danger. Many species are already in trouble because of climate change.

Location requirements for other nuclear facilities:

Why are there no location requirements for nuclear fuel production facilities, utilization facilities other than micronuclear, reprocessing facilities, or waste disposal facilities? These pose significant dangers.

Thank you for the opportunity to comment on these proposed regulations. We look forward to responses to our questions.

Sincerely,

COPPER COUNTRY ALLIANCE

/s/ Felicia Riedel

Felicia Riedel, Board Chair