

Forbes, Stewart

From: Henrietta Cosentino <henrietta.cosentino@gmail.com>
Sent: Monday, August 23, 2021 11:47 AM
To: PAAReportNOI
Cc: Hannah Vogel; Rodrigues, Paige (Markey)
Subject: [EXTERNAL] Price-Anderson Act. Modify or Repeal? Comments (due August 25th)
Attachments: Shapiro 2011 .docx; #5 Map of plume exposure pathway copy.pdf

Re <https://www.federalregister.gov/documents/2021/07/26/2021-15840/notice-of-inquiry-on-preparation-of-report-to-congress-on-the-price-anderson-act>

Dear People,

The risk of a nuclear power plant is unimaginably vast. A single plant has the potential to poison a large swath of the country. (See Plume map, Cape Downwinders via Samuel Lawrence Fdn, attached). The PAA is a misguided attempt to deal with impossible risk.

Because the federal government, through PAA, has assumed the major share of liability and financial protection, private corporate plant owners and operators understand they are off the hook—liberated from the otherwise dire constraints of the riskiest business on earth. It has given them cover to take risks which, if they had to assume liability, they would never dream of taking. No insurance on the face of the earth will cover the cost of nuclear accident.

After Fukushima, back in 2011, the cost of nuclear clean-ups was roughly as follows (See Shapiro 2011, attached):

ESTIMATED COSTS OF ENVIRONMENTAL DISASTERS

- Chernobyl \$ 600 billion
- Three Mile Island \$ 400 billion adjusted for inflation
- 9/11 \$ 2 trillion

- BP \$ 100 billion +
- Fukushima \$ 250 billion to date and growing
- Next nuclear disaster \$?????
- Current National Debt [2011]
\$ 14.4 trillion
- Total National Assets "
\$ 75 trillion
- The Property Values of 50 mile radius
of Indian Point \$ 8.5 trillion

Shifting costs to from the private sector to the federal government created a system of corporate welfare and socialized risk.

We see this played out every day at Holtec-Pilgrim, in Plymouth, MA, where Holtec, to further minimize its own tiny portion of risk, created its own limited-liability subsidiaries to protect the parent company—a clever shell game. Meanwhile, the NRC, already captured by the industry it was supposed to serve, doles out waivers to already minimal safety regulations and delivers mere hand-slaps to Holtec's frequent security violations.

We are now late in an absurdist plot. How can risk be returned to the private sector to put an end to wanton risk-taking? Can this be done retroactively?

I hope the DOE can figure it out. Otherwise, we and our government are doomed to pay unimaginable costs, while Holtec and its ilk laugh all the way to the bank.

Respectfully,

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