**Written testimony to Ohio Senate Energy & Utilities Committee**

**prepared by Michael J. Keegan for Don't Waste Michigan - June 25, 2019**

Dear Ohio Senate Energy and Utilities Committee,

I present this testimony on behalf of Don't Waste Michigan in Opposition to HB 6.  Many Don't Waste Michigan members live and recreate on Lake Erie.  Southeast Michigan is in the Secondary Evacuation Zone of Davis-Besse, and would be impacted.

Both Davis-Besse and Perry have sought and received a multitude of Exemptions from established regulations.

Those Exemptions granted relate to meeting Seismic, Flood, Fire, Security regulations, I have pasted the most recent below.   FENOC argued economic hardship as reason for requesting Exemptions.  The captured Nuclear Regulatory Commission has rubber stamped those requests.  Those regulations and many others will never be complied with as these plants are set up to be run into the ground.

Several recent instances are cited and linked below this only partial, top of the heap.   There are several more avenues by which the NRC rolls back regulation, a couple of them are through License Amendment Requests and Requests for Deferrals.

In Summary Davis-Besse and Perry are being allowed to operate in a very much compromised manner.

Amplified Public Risk results from these regulations roll-back.

Please do not bailout these very dangerous and compromised nuclear power plants - The Risk is too great,

the time to shut them is now.  Simply they cannot compete.  This is Corporate Welfare and Public Risk.

Thank you

Michael J. Keegan

Co-Chair Don't Waste Michigan,

Monroe, Michigan 48161

[ML19067A021](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML19067A021)

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| Document Title: | FENOC Fleet - Exemption from the Requirements of 10 CFR 73.55(p)(1)(i) and (ii) Related to the Suspension of Security Measures in an Emergency or During Severe Weather (EPID L-2018-LLE-0016) |
| Document Type: | Exemption from NRC Requirements Letter |
| Document Date: | 06/04/2019 |

[ML19120A208](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML19120A208)

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML19120A208>

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| Document Title: | Davis-Besse Nuclear Power Station, Unit 1, Request for Exemption from Record Retention Requirements. |
| Document Type: | Letter |
| Document Date: | 04/30/2019 |

[ML18283A946](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18283A946)

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18283A946>

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| Document Title: | Davis-Besse Nuclear Power Station, Unit 1, Revision 27 to Fire Hazards Analysis Report (FHAR), Section 1, Introduction and Summary. |
| Document Type: | Fire Protection Plan |
| Document Date: | 09/24/2018 |

[ML18283A961](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18283A961)

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18283A961>

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| Document Title: | Davis-Besse Nuclear Power Station, Unit 1, Revision 27 to Fire Hazards Analysis Report (FHAR), Section 7, Oil Collection System For Reactor Coolant Pumps. |
| Document Type: | Fire Protection Plan |
| Document Date: | 09/24/2018 |

[ML19053A558](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML19053A558)

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML19053A558>

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| Document Title: | Federal Emergency Management Agency Review Requested Of Revision To The Davis-Besse Nuclear Power Station Emergency Plan For Post-Shutdown And Permanently Defueled Condition. |
| Document Type: | Letter |
| Document Date: | 03/07/2019 |

[ML18178A588](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18178A588)

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18178A588>

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| Document Title: | FENOC Fleet - Individual FR Notice - Notice of Issuance of Exemption re: Exemption from the Definition of Physical Barrier. |
| Document Type: | Federal Register Notice |
| Document Date: | 09/06/2018 |

[ML17039A638](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML17039A638)

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML17039A638>

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| Document Title: | Davis-Besse Nuclear Power Station, Unit 1, Revision 31 to Updated Final Safety Analysis Report, Fire Hazard Analysis Report, Rev. 27, Section 2, References. |
| Document Type: | Updated Final Safety Analysis Report (UFSAR) |
| Document Date: | 11/21/2016 |

[ML17039A645](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML17039A645)

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML17039A645>

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| Document Title: | Davis-Besse Nuclear Power Station, Unit 1, Revision 31 to Updated Final Safety Analysis Report, Fire Hazard Analysis Report, Rev. 27, Section 7, Oil Collection System for Reactor Coolant Pumps. |
| Document Type: | Updated Final Safety Analysis Report (UFSAR) |
| Document Date: | 11/21/2016 |

[ML17039A635](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML17039A635)

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| Document Title: | Davis-Besse Nuclear Power Station, Unit 1, Revision 31 to Updated Final Safety Analysis Report, Section 18, Managing the Effects of Component Aging. |
| Document Type: | Updated Final Safety Analysis Report (UFSAR) |
| Document Date: | 11/21/2016 |

[ML17039A637](https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML17039A637)

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| Document Title: | Davis-Besse Nuclear Power Station, Unit 1, Revision 31 to Updated Final Safety Analysis Report, Fire Hazard Analysis Report, Rev. 27, Section 1, Introduction. |
| Document Type: | Updated Final Safety Analysis Report (UFSAR) |
| Document Date: | 11/21/2016 |