

[This op-ed, submitted but never published, will form the basis of my verbal two-minute comment on Thursday, October 29, 2020. Thank you. —Kevin Kamps, Beyond Nuclear and Don't Waste Michigan]

Op-ed re: "FirstEnergy's 'brazen arrogance' seen in Householder scandal too, critics claim," by Tom Henry, Toledo Blade, July 30, 2020

Dear Editor,

Your article invoked the 2002 boric acid lid corrosion "Hole in the Head Fiasco" at Davis-Besse, the nearest miss to a major atomic reactor disaster since the identically designed Three Mile Island Unit 2, Pennsylvania core meltdown in 1979. More safety risks have reared their ugly head at Davis-Besse since. But for HB6's billion dollar bailout, at Ohio consumer and business expense, this particularly dangerous reactor would likely have shut down for good by now. In fact, FirstEnergy Solutions had announced a May 31, 2020 permanent shutdown date, on which it reneged, once Householder perpetrated ratepayer robbery on the company's behalf.

The indicted racketeering co-conspirators' dark money, legislative, and anti-democratic corruption is quite bad enough already. But Davis-Besse's physical corruption is even worse, in terms of risk to public health, safety, and the environment. Its containment structures are corrupted, in the sense that the Inner Steel Vessel is corroded by boric acid leakage, and the Shield Building is severely cracked, even to the point of potential collapse. As safety-significant systems, structures, and components are located below, such an exterior surface concrete spall could, ironically enough, cause the meltdown, that the collapsed structure could then no longer contain, risking a catastrophic release of hazardous radioactivity downwind, downstream, up the food chain, and down the generations.

But there are more risks. The reactor pressure vessel is corrupted, in that neutron embrittlement risks pressurized thermal shock through-wall fracture, which would guarantee meltdown. The high-level radioactive waste storage pool is corrupted, in that it is leaking. The replacement steam generators are corrupted, in that they are experimental, maximizing profits at the expense of safety. Clearly, the dangerously old reactor should have been retired, as planned, on Earth Day 2017, ironically enough the expiration date on its initial 40-year license. And yet it sails ever deeper into the uncharted waters of age-related degradation breakdown phase risk, while also churning out ever more forever deadly high-level radioactive waste, for which there is no good solution.

Davis-Besse should be shut down as soon as possible. Just consider the U.S. Nuclear Regulatory Commission CRAC-II study, short for Calculation of Reactor Accident Consequences, also known as the 1982 Sandia Siting Study, or NUREG/CR-2239. For Davis-Besse, the report predicted 1,400 peak early fatalities (due to acute radiation poisoning), 73,000 peak early (radiation) injuries, 10,000 peak (latent) cancer deaths, and \$84 billion in property damage, in the event of a meltdown. But as AP investigative reporter Jeff Donn reported in June 2011, in his series 'Aging Nukes,' populations have soared around atomic reactors like Davis-Besse since 1982, so casualties would now be significantly higher. And when adjusted for inflation alone, Davis-Besse's property damage figure would be \$225 billion, in year 2019 dollar figures. Given such risks, and now the revelations of massive political corruption that secured the bailout, Davis-Besse's "life support" plug should be pulled, and the dangerous reactor retired, before the worst happens.

From 2010 to 2016, Beyond Nuclear helped lead a coalition of environmental groups, including Don't Waste Michigan, the Ohio Green Party, and Citizen Environmental Alliance of Southwestern Ontario, that challenged Davis-Besse's 20-year license extension. From 2013 to 2014, Beyond Nuclear joined with that same coalition, as well as the Sierra Club Ohio Chapter, to challenge Davis-Besse's experimental steam generator replacements; world-renowned Fairewinds Energy Education nuclear engineer, Arnie Gundersen, served as expert witness. In both proceedings, Toledo attorney Terry Lodge served as the coalition's legal counsel.

Unfortunately, we did not succeed in either intervention. I hope and pray our warnings will be heeded now, before it's too late.

After closure, the priority should be a just transition for the Davis-Besse workforce and host communities, as well as comprehensive radiological cleanup of contamination during the safest possible decommissioning. Last but not least, safe and secure containment of the highly radioactive irradiated nuclear fuel is required, in order to protect Lake Erie and the Great Lakes basin downstream. Hardened On-Site (or Near-Site) Storage is a policy position endorsed by more than 200 environmental organizations in all 50 states, including the Sierra Club, and the Toledo Coalition for Safe Energy.

Sincerely,

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Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.