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Beyond Nuclear

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The Ohio Nuclear Free Network (ONFN) and **Beyond Nuclear** are not-for-profit research and education organizations concerned with the health, safety, environmental and accident risks posed by commercial nuclear power plants.

On Tuesday November 28, 2023, these groups filed with the Nuclear Regulatory Commission (NRC) to intervene and requested an adjudicatory hearing in opposition to a 20-year license extension for the Perry Nuclear Power Plant. The petitioners raised three contentions regarding the inadequacy of Energy Harbor's (EH) License Renewal Application (LRA).

CONTENTION 1: The Severe Accident Mitigation Analysis Is Inadequate. The **Declaration on Perry Geological Problems** by Julie Weatherington-Rice shows **immediate as well as future risk** due to:

- failure to undertake a thorough level of review of the structural integrity of the facility;
- an outdated geotechnical analysis of the Perry site that is not predictive of actual site conditions including earthquakes, lake erosion, and leaks from wet and dry storage moving to the lake;
- heat from the plant that could expand underlying shale and structurally undermine the facilities;
- solution of the underlying Salina (salt) Formation that could destabilize the entire site;
- landslides developing behind the rock shield of the bluff, dumping the rocks into the lake and exposing new faces of the bluff;
- known and unknown oil/gas and water wells threatening the integrity of nearby rock and soils.

CONTENTION 2: The power generated by Perry is redundant; the plant can be permanently shut down without consequence to regional power availability. Energy Harbor exaggerates and misrepresents the importance of Perry as part of the post-2026 energy mix by:

- failing to provide projections, pricing information or assessment of incoming new generation resources;
- failing to provide statistical or factual analyses of electric overcapacity within Ohio, or from multiple neighboring states;
- neglecting to consider that Perry's generation is and will be too expensive; and
- failing to offer its customers voluntary energy efficiency programs.

CONTENTION 3: Perry's Tritium Problem

Tritium is radioactive hydrogen. It bonds easily with oxygen to form radioactive water. Once tritium becomes part of the water molecule, it cannot be removed. Tritium readily crosses the placental barrier, resulting in significant biological consequences, including:

- damage to DNA;
- impaired physiology and development;
- reduced fertility and longevity; and
- can lead to elevated risks of diseases including cancer.

Yet over the proposed 20-year extension, Perry will routinely release all tritium in the primary coolant to the environs, either as water vapor or gas to the atmosphere. In addition, there have been numerous tritium spills and leaks of considerable concern over the past decade.

The Petition for Leave to Intervene can be found here:

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23332A784>

See this link for [more information on Perry contentions](#).