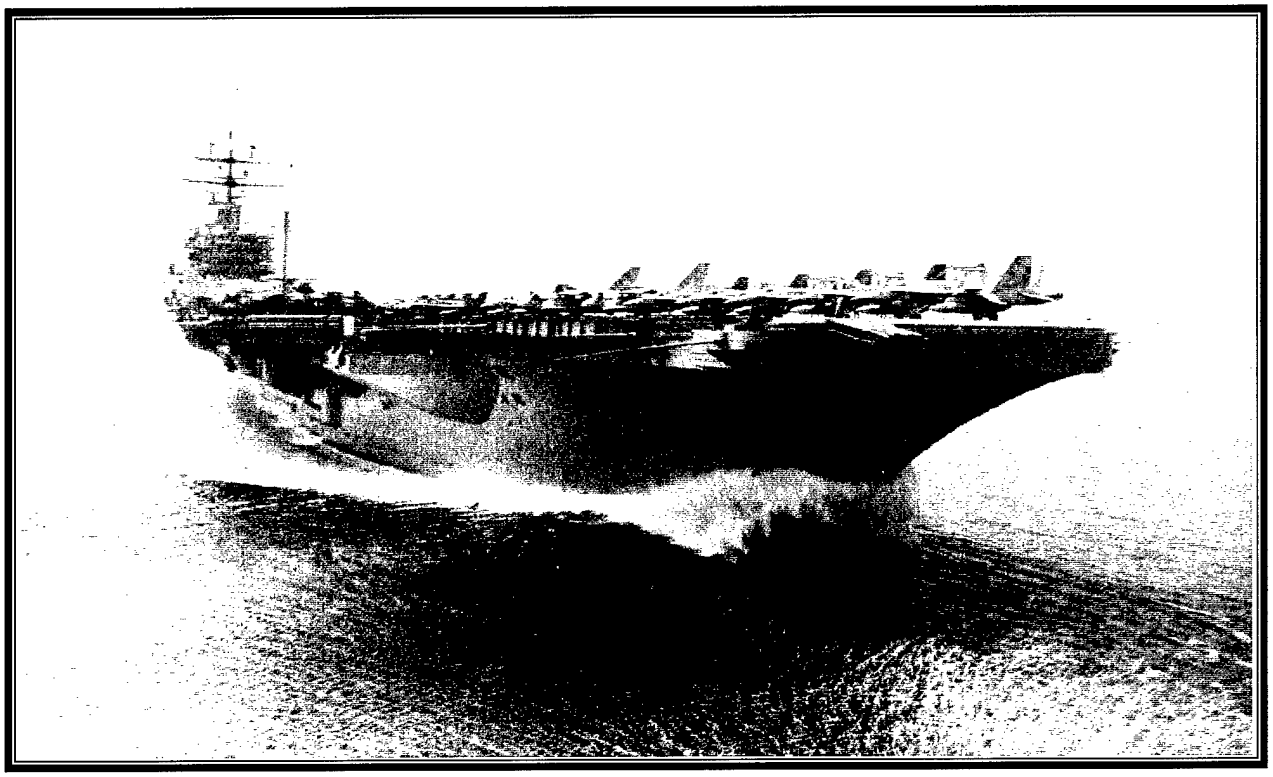
Final Environmental Impact Statement for

Developing Home Port Facilities for Three NIMITZ-Class Aircraft Carriers in Support of the U.S. Pacific Fleet

Coronado, California • Bremerton, Washington
Everett, Washington • Pearl Harbor, Hawaii



Volume 7 – Part B

Comments and Responses for Coronado, California

July 1999

19990714 004

Department of the Navy

DTIC QUALITY INSPECTED 4

ERRATA SHEET

THE FOLLOWING CHANGES ARE MADE IN THE RESPONSES TO COMMENTS FOR PUBLIC HEARINGS FOR VOLUME 7B:

VOLUME 7 CVN HOMEPORTING EIS — NASNI RESPONSE TO COMMENTS

Comment Number	Response
H.1.33	Please refer to response to comment I.76.1 and L.4.12.
H.2.96	Please refer to response to comment I.76.1 and L.4.12.

Final Environmental Impact Statement for

Developing Homeporting Facilities for Three NIMITZ-Class Aircraft Carriers in Support of the U.S. Pacific Fleet

Coronado, California • Bremerton, Washington
Everett, Washington • Pearl Harbor, Hawaii

VOLUME 7 - Part B

Comments and Responses for Coronado, California Individuals and Public Hearings

July 1999

Department of the Navy

DISTRIBUTION STATEMENT A
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Introduction to Public Comment Organization

This section presents comments received during the Draft EIS public comment period, and responses to each comment. The comments received are in the form of letters or comments received at the public hearings. For simplicity, the following characterizes comments received as "letters," and each specific issue raised in each letter as a "comment." The comment letters and their responses are organized into sections for each potential CVN homeporting location: Coronado, Bremerton, Everett, and Pearl Harbor. Within each CVN homeporting location section, public comment letters are grouped by the commentor's affiliation and are abbreviated as follows: Federal agencies (F); State agencies (S); Local agencies (L); Organizations (O); and Individuals (I). Comments recorded from the Hearing Transcripts completes each comment set (H). Individual comment letters in each of these groups are numbered in the chronological order in which they were received by the Navy. For example, the first Federal comment letter received for each CVN homeporting location is identified as F.1. Specific comments are numbered as follows: F.1.1, F.1.2, F.1.3, etc. The second Federal comment letter received for each location is numbered F.2. Specific comments are numbered F.2.1, F.2.2, F.2.3, etc. State letters are coded S.1, S.2, S.3 etc.

There are a number of comment letters that include comments about more than one of the locations. In these instances, the comment letter has been assigned multiple codes for each CVN homeporting alternative location that is addressed. The specific comments relevant to that CVN homeporting location are identified. The comment letter is listed in each relevant CVN homeporting alternative location section, and only the specific comments relevant to that location are indicated.

Immediately following each comment letter are the responses to those comments, numbered to correspond to comment codes. Pages are identified by comment code, so that all pages with comments and responses to letter F.1 are indicated with this code at the bottom of the page. The table of contents following this introduction lists each comment letter, the date sent, and the corresponding code.

A number of comments on the Draft EIS were submitted in Spanish. These letters have been translated into English by a certified translator. Responses appear in both English and Spanish. On the page immediately following this introduction, the translator's certifications are presented.

Due to the number of comments received for Coronado, California, comments and responses for that site have been divided into two documents: Volume 7, Part A, and Volume 7, Part B. Comments from Federal, State, and Local agencies, as well as Organizations, are included in Volume 7, Part A, and comments from Individuals and those made at Public Hearings are included in Volume 7, Part B. Comments and responses for Bremerton, Washington; Everett, Washington; and Pearl Harbor, Hawaii, are bound separately in Volumes 8-10.

CARLOS CERECEDO
STATE CERTIFIED COURT INTERPRETER
2420 MODOC RD.
SANTA BARBARA, CALIFORNIA 93105
PHONE & FAX: (805)963-4483

Judicial Council Certificate Number 300249

CERTIFIED TRANSLATIONS

Script and Translation of Tape Comments

AFFIDAVIT

I, CARLOS CERECEDO, STATE OF CALIFORNIA COURT CERTIFIED INTERPRETER -TRANSLATOR, JUDICIAL COUNCIL CERTIFICATION NUMBER 300249, HEREBY CERTIFY, THAT THE ATTACHED DOCUMENTS ARE A FAITHFUL AND TRUE TRANSCRIPTION AND TRANSLATION FROM THE SPANISH LANGUAGE TO THE ENGLISH LANGUAGE TO THE BEST OF MY KNOWLEDGE AND ABILITY.

CARLOS CERECEDO
COURT CERTIFIED
INTERPRETER- TRANSLATOR
JUDICIAL COUNCIL # 300249

Santa Barbara, November 6, 1998.

CARLOS CERECEDO
STATE CERTIFIED COURT INTERPRETER
2420 MODOC RD.
SANTA BARBARA, CALIFORNIA 93105
PHONE & FAX: (805)963-4483

Judicial Council Certificate Number 300249

CERTIFIED TRANSLATIONS
SIX COMMENTS IN SPANISH FOR THE DRAFT EIS
1 ESTRADA
2 RODRIGUEZ
2 MIRAMONTES
1 URCINO

AFFIDAVIT

I, CARLOS CERECEDO, STATE OF CALIFORNIA COURT CERTIFIED INTERPRETER -TRANSLATOR, JUDICIAL COUNCIL CERTIFICATION NUMBER 300249, HEREBY CERTIFY, THAT THE ATTACHED DOCUMENT IS A FAITHFUL AND TRUE TRANSLATION FROM THE SPANISH LANGUAGE TO THE ENGLISH LANGUAGE TO THE BEST OF MY KNOWLEDGE AND ABILITY.

CARLOS CERECEDO
COURT CERTIFIED
INTERPRETER- TRANSLATOR
JUDICIAL COUNCIL # 300249

Santa Barbara, November 6, 1998.

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8/22/98

Mr. John Coon, Project Manager
Southwest Division, Naval Facilities Engineering Command
Code 05AL-JC
1220 Pacific Highway
San Diego CA 92132

Dear Sir, I feel that homeporting Nuclear Aircraft Carriers in San Diego seriously weakens our national defense.

REMEMBER PEARL HARBOR

I.1.1

We do not need another "Pearl Harbor" disaster. Parking one or more Nuclear Aircraft Carriers deep in San Diego Bay will be a repeat of December 7, 1941. The berthing place in San Diego can only be reached in high tide and is deep within the harbor. Any terrorist could simply sink a fishing boat at the entry to San Diego Bay and the Aircraft Carrier could not get to sea to defend our country. If there is a fire or nuclear accident aboard the ship there is no way to quickly float the ship to sea and out of harms way. This threatens the health and safety of everyone living in San Diego, the sixth largest city in the United States.

REMEMBER PEARL HARBOR. NO HOMEPORTING OF NUCLEAR AIRCRAFT CARRIERS IN SAN DIEGO

Jack A Brill
6260 Oakridge Rd
San Diego CA 92120
619-582 7717

Comment Number	Response

Jack A. Brill

I.1.1 The Navy has never stated that CVNs could not transit the San Diego Harbor Channel under low tide conditions in emergency situations. Sufficient depth exists in San Diego Channels to accommodate emergency situations. CVNs under normal conditions can transit the San Diego channel under all but the lowest of "minus" tides. Since the dredging of the channel and turning basin occurred in 1998, fully loaded CVNs have large windows of sailing times at MLLW or better. The approximate time needed from taking in all lines to clearing the tip of Point Loma is 45 minutes. The location of three CVNs in San Diego poses no more of a "Pearl Harbor" threat than has existed with the three conventionally powered aircraft carriers homeported there. Please refer to response to comments O.14.6, I.37.1, and I.29.2.

A wide range of hypothetical accidents was considered in the development of the analysis presented in the EIS. The hypothetical accidents analyzed indicate risks that are unlikely to be exceeded by other accidents (e.g., airplane crash, earthquake, tsunamis, or terrorism). The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

Reproduction clarity limited by quality of comment letter received.

ept. 1, 1998

John Coon
Navfacengcom
1220 Pacific Highway
San Diego, CA. 92135-5190

I support The Military & Navy
n Whatever They do,
I believe our ships should
e based here, so, our men
n be closer to home when
ssible.
I am not afraid of any nuclear
vered ship the Navy has &
ude the three Ninety - class
clear aircraft carriers should be stationed
- North Island.
We Cannot Compare our nuclear

I.2.1

Reproduction clarity limited by quality of comment letter received.

II

Carriers with the San Onofre Plant_

Besides I believe That the Environmental Agencies go overboard on some of their ideas.

I will not be able to attend e of The Public Hearings due age and health_

Joanne Marsh
9703 Wintergardens Blvd. #146
Lakeside, CA. 92040

I.2.1

Comment Number	Response

Joanne Marsh

I.2.1 Your comments are noted and are included in the Final EIS.

Richard Dittbenner, J. D., Cand. Ph.D.

Campus:
Southwestern College
900 Otay Lakes Road
Chula Vista, CA 91910-7299
Tel: 619.421.6700 x 5614
Fax: 619.482.6435
email: environmentalproject@juno.com

After Hours:
260 A Avenue
Coronado, CA 92118-1913
Tel: 619.437.0077
Fax: 619.437.0097
email: rdittbenner@aprynet.com

September 9, 1998

Mr. John Coon
Southwest Division
U. S. Navy
San Diego, CA 92132-5190

Sent Via Fax to (619) 532-4998

Dear Mr. Coon:

Request for Rescheduling of Public Hearing Dates for Draft EIS (Nuclear Aircraft Carrier Homeporting) and Extension of Time for Public Comment – Discrimination Against Citizens of the Jewish Faith

I.3

This letter is to bring to your attention acts and omissions by the US Navy in San Diego which are contrary to the requirements of federal and state environmental policy. Both of these acts and omissions limit public participation in the Navy's environmental decision-making. These are contrary to NEPA and the Presidential Directive on Environmental Justice. I.3.1

Several weeks ago, I called the Navy's information line set up for the purpose of responding to questions and concerns about the upcoming Draft EIS. I left my name, home phone number, and home address (noted above) in connection with my request to receive a copy of the Draft EIS. To date, **I have not received a copy of the Draft EIS as I requested, nor have I received any communication regarding my request.**

Secondly, the dates for the hearing in San Diego and Coronado should be rescheduled. By scheduling back to back hearings in Coronado and San Diego on September 29th and 30th, the Navy has done to those of the Jewish faith, that which would be unthinkable if done to members to the Christian faith. The evening of September 29th is the holy day of Kol Nidre. September 30th is Yom Kippur, the holiest day of the year on which members of the Jewish faith are obligated to spend in religious observance beginning the evening of September 29th. I.3.2

Would the US Navy hold public hearings on its plans to homeport two additional nuclear powered carriers in San Diego Bay on Christmas and Easter? No? Why is the Navy asking people of the Jewish Faith to participate in public hearings on the most holy of days that it would not also ask of Christians?

The constitution calls upon the government not to discriminate in favor of one religion over another. By holding these hearings on Yom Kippur, the **Navy is discriminating against citizens of the Jewish faith in favor of Christians.** The Navy should **reschedule the hearings and extend the time for public comment an additional 90 days.** The Navy should also **provide a copy of the Draft EIS to all who asked for a copy.** I.3.3

Please direct all correspondence to my home address as noted above.

Sincerely,

Richard Dittbenner

Richard Dittbenner, J. D., Cand. Ph.D.
Professor of Law

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Congressman Bob Filner
Congressman Brian Bilbray
Mayor and City Council of Del Mar
Mayor and City Council of Imperial Beach
Mayor and City Council of San Diego
Mayor and City Council of Chula Vista
Mayor and City Council of Coronado
Mayor and City Council of National City
Mayor and City Council of Solana Beach

Comment Number	Response

Richard Dittbenner

I.3.1 As requested, you were sent a copy of the Draft EIS.

I.3.2 The public hearings for the Draft EIS were rescheduled to October 27 and 28 in Coronado and San Diego, respectively.

I.3.3 The Navy extended the public review period an additional 30 days. The Navy has provided additional copies of the Draft EIS to those who have requested them.

Sep 10, '98

Dear Mr. Coon:

I am very much against the atomic carriers docking @ North Island where there is human work, there can also be human error. In this day of "sneaky" warfare - terrorist activity, etc. they would certainly be ripe targets. In case of an "accident", Coronado & San Diego would be destroyed, as well as thousands of people. I4.1

Such ships should be parked way out to sea w/ boats to commute to the mainland. cp

People in Cheroble, Russia were probably told their plant was safe too, so we should have a lesson there, (and 3 mile Island, etc.)

I think this should be a very serious decision.

Thank you for "listening"

Ruth Hames
2221 Louise Dr.
Norman, Okla. 73071

P.S. My sons & I own property in Coronado & I lived there 27 yrs.

Comment Number	Response

Ruth Hames

I.4.1 A wide range of hypothetical accidents was considered in the development of the analysis presented in the EIS. The hypothetical accidents analyzed indicate risks that are unlikely to be exceeded by other accidents (e.g., airplane crash, earthquake, tsunamis, or terrorism). The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

9-11-98

Mr. John Coon
(Code 05AL.JC)
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, Ca. 92132

Dear Mr. Coon.

Our family strongly objects to the Department of the Navy's plans to home port 3 NIMITZ-class nuclear powered aircraft carriers in San Diego harbor. I.5.1

As I work at the airport, I strongly oppose new hazardous and radioactive waste treatment and storage facilites on North Island.

In addition to increased amounts of pollutants in the air and harbor, the potential risks of accidents is staggering.

We, as resident of the greater San Diego area, should not have to live under a cloud of fear and uncertainty regarding a nuclear accident (especially since the US Navy refuses to release the area downwind of an emergency that should be evacuated.) Stop this proposal of any more nuclear carriers now.

Lyle R. Hepburn

3221 Bancroft # 10
Spring Valley, Ca. 91977

Comment Number	Response

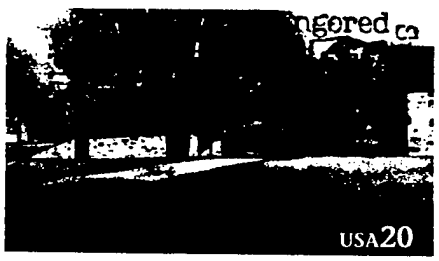
Lyle R. Hestum

I.5.1 Please see responses to comments O.12.49 and I.4.1.

Reproduction clarity limited by quality of comment letter received.

Box [illegible]
San Diego CA [illegible]

SAN DIEGO CA 921
15 SEP
1998



Mr John Coon, Project Manager
Southwest Division
Naval Facilities Engineering Command
[illegible] Pacific Highway
San Diego CA 92132-5[illegible]

I am opposed to a nuclear presence in San Diego.
Please notify me of any public hearing regarding the homeporting of nuclear aircraft and the expansion of a nuclear waste site. I.6.1

J. Doughty
PO Box [illegible]454
San Diego CA 92164

Comment Number	Response

J. Doughty

I.6.1 Although no specific issues were noted by the commentor, the Navy notes the commentor's general opinion regarding the proposed action. As requested, the commentor's name has been added to the distribution list for notifications concerning this proposed action.

To: JohnCoon, USN
From: Russell D. Hoffman
(U.S. Citizen)
Re: San Diego CVN DEIS
Date: 9/15/98

Dear Sir:

Please send a copy of the DEIS for the U.S. Navy's Nuclear homeporting in San Diego. I wish to review the document as extensively as possible and live in Carlsbad; My schedule would preclude the many trips to downtown San Diego such research would entail. Furthermore as I intend to publish My reports, I will need to have continued access to the document.

My address follows on page 2

9/15/98

(Page 2 of 2)

I.7.1

Please send (1) one copy* of the USN DEIS for the homeporting of CVN's in S.D. Bay to:

Russell D. Hoffman
P.O. Box 1936
Carlsbad CA 92018-1936

Thank you,

Russell Hoffman

*and all related documents in support of the NAVY position.

Comment Number	Response

Russell D. Hoffman

I.7.1 A copy of the Draft EIS was sent to you upon your request.

DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

11000
Ser 5731.RH/3061
SEP 16 1998

Ladies and Gentleman:

Because of public interest in the Navy's Draft Environmental Impact Statement (DEIS), Developing Homeport Facilities for Three NIMITZ-Class Aircraft Carriers in Support of the U.S. Fleet, we have decided to extend the public review period approximately 30 days and to reschedule the public hearings from September to October. We believe that this extra time will allow you to thoroughly review and comment on the Navy's proposal. Your comments should be postmarked on or before November 12, 1998.

The public hearings that were scheduled in September are being rescheduled for the last two weeks in October. As soon as these dates have been confirmed, we will again notify the public through the DEIS distribution list and through the local newspapers.

Thank you for your interest in this matter. If you have questions, please contact Mr. John Coon at (888) 482-6440.

Sincerely,

JAY H. KEYES
Head, Business Department
By direction of the Commander

Sept 19, 98

Mr. Keyes:

Thank you for this letter informing me of the 30 day extention. It was not necessary to Spend $10 to over night express it sir, A 32 cent would have been adequate. By the way, I never recieved the E.I.S. But not having had access to it, I am still inclined to believe that Nuclear powered ships should not be housed in Enviornmentally Sensitive Area —>

I.8.1

I.8.2

like the San Diego harbor or Coronado Area. It is a beautiful area and I don't think that nuclear powered ships is consistent with the fragile ecological systems. I say that knowing my son-in-law is an Officier with the U.S. Navy and has served on several Air Craft Carries. But, I still believe that it would be wrong to expand the over-load of the nuclear powered ships in that fragile Area. Please review cautiously and sincerely in this dramatic move. Our future depends on it. Our natural world is at risk!

I.8.2

Respectfully,

Judy Johnson

Granddaughter of Ens. (Ret.) Naval Grandsons

Comment Number	Response

Judy Johnson

I.8.1 A copy of the Draft EIS was sent to you upon your request.

I.8.2 Please see response to comment I.4.1.

MICHELE MURPHREE
2229 FROUDE STREET
SAN DIEGO, CA 92107

September 24, 1998

Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

To Whom It May Concern:

I am very concerned about the nuclear reactors in the bay. Please notify me of any public hearings about the nuclear aircraft carrier homeporting at the above address. I.9.1

Sincerely,

M. Murphree

Michele Murphree

Comment Number	Response

Michele Murphree

I.9.1 A letter was sent to you with the revised public hearing dates.

Sept. 24, 1998

Dept. of Navy
Mr. Jay H. Keyes

Dear sir:

I received your letter of the change of the hearings from Sept. to October -

I am 67 years old & not in good health & don't have transportation to go to the hearing.

But, you can have someone read this letter & sent your comment support of the Navy's

Joanne Marsh
9703 Winterguden Blvd. #146
Lakeside, CA 92040

I.10.1

Dept. of Navy
Southwest Division.
Naval Facilities Engineering
1220 Pacific Hwy
San Diego, CA. 92132-
5190

Ms. Joanne Marsh
146
9703 Winter Gardns. Blvd.
Lakeside, CA 92040-3840

Comment Number	Response

Joanne Marsh

I.10.1 Your comments are noted and included in the Final EIS. Your previous letter is also included and responses provided (see letter coded as I.2 and response I.2.1).

To Mr. John Coon,

We wish to register our dismay, at the home porting of yet 2 additional Nuclear Carriers in the San Diego Bay. We have not been apprised of the environmental impact in our area, nor the risks involved, to our satisfaction. I.11.1

My husband and I have lived in San Diego for over 50 years, and have knowledge of the toxic impact of the Navy in North Island, already. We feel that toxic waste is still a major problem, and now you are adding additional environmental concerns. These carriers and their infrastructure, are too close to our city and homes, and we have not been informed sufficiently.

Do not create a Megaport of Nuclear Carriers, in the San Diego Bay, and do not build all the surrounding infrastructure to contain its waste, and support its needs!!

In deep concern,

Anita and Irv Hosenpud
1016 Cypress Way
San Diego, California 92103

Comment Number	Response

Anita and Irv Hosenpud

I.11.1 Your comments are noted and are included in the Final EIS.

Stephen Wawrytko

7183 Canyon Hill Way
San Diego, CA 92126

October 6, 1998

Mr. John Coon
(Code 05AL.JC)
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132

Subject: DEIS for Nuclear Powered Aircraft Carriers

Dear Mr. Coon:

I.12

I am TOTALLY against any plans to locate nuclear equipment, materials or storage facilities anywhere near San Diego. The military nuclear facilities we currently have are a hazard every day to the citizens of San Diego county. We do not need or have any desire to locate any additional military nuclear materials in San Diego county or Coronado. I.12.1

As a Chemical Engineer I have worked with the design and operations of nuclear facilities and other types of engineering projects worldwide. My background, education and over twenty-five years experiences provide me with a strong knowledge of the technical, logistical and financial issues for these type of facilities. It is my firm believe that the current and proposed nuclear facilities on military property near San Diego are unsafe and harmful to the citizens around these facilities. That includes the city of San Diego, all San Diego County and parts of Arizona. I do not feel from a technical view that the military, especially the Navy, can properly operate such facilities. The dangerous chemicals the Navy dumps regularly are having long term effects on all the citizens of San Diego. I.12.2

During the Vietnam era, I served as a Technical Manager in the military after graduating from college. While stationed in Germany, I saw first hand how the military handles toxic, hazardous and other materials. The military does not have any regards for local or federal regulations and always uses National Defense as an excuse to pollute any facility they occupy. Although the Navy states they comply with the EPA here in San Diego, the EPA does not have total access to their facilities. The Navy continually builds in San Diego without ever checking with local or federal agencies. In fact, they even build many facilities without any funding, knowing that if they go far enough the funds cannot be denied without Congress losing large amounts of tax dollars from their advanced construction. The military continues to burn materials on Miramar every year, which people can see from the smoke. This is illegal for the public or private sectors, but the EPA does not stop the military from polluting the air.

The island of Coronado, San Diego Bay and the Pacific Ocean around the Navy facilities are, in my opinion, all a large environmental superfund project. The Navy continues to dump very hazardous and toxic materials on their base and in the waters around their facility. There are many cases where the Navy got caught dumping hazardous materials or venting toxic substances, but these are only the tip of very large problem. There are far more incidents of toxic dumping or accidental venting that the public NEVER hears about. The Navy continues to use National Security as a way of covering up and preventing the proper civilian agencies from monitoring their waste. Today, San Diego Bay is a very dirty and toxic waste site due to the operations of the Navy. I.12.3

After our experience at Pearl Harbor, the United States should be more concerned with the effects of any attacks against military facilities. Unlike conventional materials, nuclear chemicals are far more damaging to human life and have a very long existence. Today there are more terrorists operating in the world than ever. If such nuclear facilities or Naval vessels were attacked, the discharges and fires could have irreversible damage to millions of innocent people. Instead of locating these highly dangerous vessels near large populated areas, the military should evaluate more remote and more defendable locations. A base like Coronado and San Diego Bay are extremely open to daily access from the public. The Navy cannot give the citizens of San Diego a 100 percent guarantee that their facilities will never be attacked. Yet just one incident where the Naval nuclear facilities are attacked can make San Diego county uninhabitable for centuries. I.12.4

The Navy has very likely had nuclear discharges into the atmosphere many times in the past, but will never report these facts. It is irresponsible and immoral to locate such a large amount of nuclear material upwind and right next to the sixth largest city and the second largest populated county in the United States. The Navy is putting millions of innocent civilians, as well as their families, in great danger. Their past record and their attitude toward civilians are a strong indication of their inability to operate nuclear facilities safety and responsibly. Like many of the toxic materials the Navy discharges every day, it takes decades for the chemicals to effect or kill human beings. The Department of Defense and the Navy knows this fact and uses it as a tool to keep the public off balance. I.12.5

The Department of Defense and especially the Navy does not have a very good track record with the American taxpayers. They continually lie and deny any dangerous operations until somehow the facts become public. It is well-known how they lie to the President, the Congress, technical advisors, medical personnel and people in every nation on this earth. During the cold war era the military used millions of innocent civilians as test subjects without ever telling anyone. Also the military denied using any chemicals in Viet Nam and Desert Storm yet many uninformed military personnel developed irreversible medical problems. The military continues to expose innocent people to all types of dangerous materials because they always say that civilians are expendable. They use National Security as an additional excuse for their irresponsible behavior and arrogant attitudes. It is a fact that since the Navy did the environmental research reports that these documents are false and incomplete based on their past record. I.12.6

My opinions are not anti-Navy but are directed against the Department of Defense and the military leadership. My family has served in the military for several generations. I am very concerned with the quality of leadership in our armed services today. We do not have the most responsible, professional and competent Americans in the DOD or as military leaders in this country anymore. Because of budget cuts, downsizing and politics, the military today is not a very responsible organization. The older military leaders are too arrogant, self centered and have the wrong attitude about National Defense and National Security. We are no longer in the Cold War yet many military leaders operate under this same game plan. In time of war the military is in complete control and dictates their demands. This country has not been in this situation for decades yet the DOD and the military leaders still operate with this same attitude. Our military is paid by the taxpayers to serve and protect the people of this country. Unless we can control this military, the people of this country are nothing more than prisoners of a military dictatorship. I.12.7

The mayor and the city council of San Diego want any and all Naval facilities they can get for this city. Their only interest is the military payroll and impact on the local economy. This does little good for the citizens if they are at extreme risk from these facilities. People all over this country are refusing to allow garbage dumps from being located in their communities. Americans' do not have the same power in trying to prevent military facilities in their own communities. We need common sense and rational thinking when we locate our military facilities. There is no rational or common sense reason for locating any nuclear powered vessels of any kind in San Diego. I.12.8

I.12

Based on the facts stated above, the American taxpayers and especially the citizens of San Diego cannot trust the reports, studies or evaluations associated with this DEIS. The data will be biased, misleading and not thorough enough to cover the complete facts. Many of the problems from the nuclear materials are long term and these documents do not address these type issues. The DEIS covers the direct, indirect and short-term impacts but does not identify long term effects which the Navy knows are more critical. The public hearings will not consider the bad record and attitude of the Navy which has a SIGNIFICANT EFFECT on the operation of such facilities. Any information on the operation of the existing nuclear facilities in San Diego will be inaccurate because of these facts. Unlike a civilian facility, the military will not, have not and cannot operate such hazardous facilities responsibly and safely. By their own standard operating procedures (SOP), the military cuts corners to accomplish their military objectives. I.12.9

Very concerned citizen,

S. Wawrytko

Stephen Wawrytko

Comment Number	Response

Stephen Wawrytko

I.12.1 Your comments are noted and are included in the Final EIS.

I.12.2 All facilities constructed by the Navy are subject to the NEPA process. No facility can be built without funding; it is impossible to do so under federal contracting regulations.

The burning of materials at Miramar that you commented upon is not from any Navy operation. If smoke is seen emanating from County of San Diego landfill operations there, it is within the allowances of County of San Diego air permits issued to the City.

In the third paragraph of your letter, you claim that the Navy currently operates outside the strict federal and local regulations in its handling of toxic and hazardous material. However, all such Navy facilities are permitted and local, state, and federal regulators audit the Navy's operation. The EPA is granted access to military facilities and issues reports on the Navy's compliance with environmental laws and regulations.

Please see response to comment I.4.1.

I.12.3 For information on the Navy's compliance with regulations for the handling of toxic materials, please see response to comment I.12.2 immediately above.

I.12.4 San Diego historically has been home port to three aircraft carriers (CVs). The proposed action will not cause this number to increase, but only to change the type of aircraft carrier (CVN) homeported at NASNI. Therefore, there would be no change to the strategic value of San Diego as a result of the proposed action. Please see also response I.4.1. In addition, the development of reasonable alternatives evaluated in the EIS is described in section 2.3.

I.12.5 Please see response to comment O.12.33.

I.12.6 Although no specific or substantiated issues were noted by the commentor, the Navy notes the commentor's general opinion regarding the proposed action.

I.12.7 Your comments are noted and are included in the Final EIS.

I.12.8 Your comments are noted and are included in the Final EIS.

I.12.9 It is important to note that the results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant direct or indirect or short or long-term radiological impacts from homeporting

Comment Number	Response

and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

October 7, 1998

Mr. John Coon
Project Manager
Southwest Division, Naval Facilities
Engineering Command, Code 05AL-JC
1220 Pacific Highway
San Diego, CA 92132

Dear Mr. Coon,

We realize that the purpose of the U.S. Navy is to protect Americans. That's great. But the prospect of three nuclear aircraft carriers homeporting in San Diego Bay strikes terror in our hearts. I.13.1

We have heard the rhetoric: "Nuclear power is safe," "San Diego has had nuclear subs for years," "It's for the defense of our nation" (good of the many vs. good of the few?), yadda, yadda. One mistake and it's all over for San Diego.

We say "NO" to additional nuclear carriers. We'd like to see a San Diego free of nuclear-powered vessels and nuclear waste.

With friends like the Navy, who needs enemies? One day we will all be sorry when there's an "accident."

Sincerely,

Patty Mooney

Mark Schulze

2336 Sumac Drive
San Diego, CA 92105
(619) 282-6126

Comment Number	Response

Patty Mooney and Mark Schulze

I.13.1 Please see response to comment I.4.1.

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To: MR. JOHN COON PROJECT MGR, SOUTHWEST DIVISION, NAVAL FACILITIES CODE 05AL-JC

Fax No.: (619) 532-4998

From: N. BOURKE

Phone No.: _____

# of Pages (including this sheet): _____

Message: PLEASE, NO NUCLEAR AIRCRAFT CARRIERS IN SAN DIEGO. ALL USE OF NUCLEAR POWER SHOULD BE DISCONTINUED, FOR THE HEALTH OF SAN DIEGO. PLEASE ALLOW OUR CITY TO STAY BEAUTIFUL & HEALTHY. THANK YOU. Helen M. Bourke

I.14.1

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Comment Number	Response
H. Bourne	
I.14.1	Your comments are noted and are included in the Final EIS.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Joel Reed

Address: Coronado

COMMENTS:

Military Question

What Military Risks does the NAVY Envision in Bringing More Ships & personel to home port in San Diego Bay From Chinese Missles with Super Advanced guidance systems? I.15.1

Has San Diego Bay Become a Potential Pearl Harbor Target, if so, what Does the Navy plan to do about it? Bring more ships, and personel here, To Enjoy the Sunshine & Palm Trees? I.15.2

Signature

6/28/98
Date

Note: This form is supplied for your convenience. You are not required to use this form. Comments of any length may be submitted to the address on the reverse side of this form. Your comments should be postmarked on or before November 12, 1998.

Comment Number	Response

Joe Bacon

I.15.1 It is beyond the scope of this environmental document to hypothesize on a theoretical scenario involving terrorist activities in the San Diego area. In addition, the Navy does not perceive that having three CVNs at NASNI increases the security threat beyond the potential that has existed for the past several decades. The robustness of a naval vessel designed to withstand combat damage lessens the potential impact that such an act might incur. Increased numbers of CVNs is not deemed to present any significant increased risk to the San Diego area from Chinese missiles with Super Advanced Guidance Systems. See also response to comment L.4.44 and I.15.2 below.

I.15.2 The Navy does not perceive that having three CVNs at NASNI increases the threat from terrorists beyond the potential that has existed for the past several decades. In addition, the robustness of a naval vessel designed to withstand combat damage lessens the potential impact that such an act might incur. The very nature of a military asset diminishes its attractiveness as a target for terrorist. Not only is there a constant posture of security maintained through tightly controlled access and roving patrols, but the ability of the trained "targeted personnel" to react with deadly force increases the risk to the terrorist. Please refer to responses I.15.1 and I.37.1.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Eric Bowlby

Address: 3552 Bancroft St. San Diego, CA 92104

COMMENTS:

I am opposed to more nuclear reactors in San Diego. The more we have the better the chance of having an accident. We need to find safe, alternative military strategies to replace nuclear carriers. I am certain we can do it. Please don't perpetuate the alternative using nuclear reactors because they have so many potential, catostrophic consequences. I.16.1

Thanks for hearing my concerns.

Eric Bowlby
Signature

10/28/98
Date

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Comment Number	Response

Eric Bowlby

I.16.1 Our publicly-elected U.S. Congress and President of the United States make programmatic decisions regarding Naval ships (e.g., application of nuclear power), and thus comments regarding these decisions are beyond the scope of this EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

JACK A. BRILL
6260 Oakridge Rd.
San Diego CA 92120

(619) 582-7717 (800) 733-6178
Fax (619) 582-2243

October 28, 1998

Department of the Navy
Southwest Division
Navy Facilities Engineering Command
1230 Pacific Highway
San Diego CA 92132

I strongly oppose the home porting of Nuclear Aircraft Carriers in San Diego for the following reasons: I.17.1

1. "Pearl Harbor" consequences. I remember Pearl Harbor December 7, 1941. Do not repeat this possibility. Docking three Nuclear Aircraft Carriers in San Diego is a repeat of Pearl Harbor. Nuclear Aircraft Carriers docked at the North Island quay wall can not go to sea **if there is low tide**. If there is high tide, they need four or more tugboats to get them out to sea. A minimum of two hours time. In case of war or nuclear power plant failure this makes the docking of the ships at the quay wall a disaster waiting to happen. We already have many nuclear submarines here in San Diego. We should not concentrate so much sea power in one port.

2. National Defense is reduced. Because of the reasons cited above the $45 billion dollar war machines can not get to sea in sufficient time or may be seriously delayed if the entry to San Diego Bay is blocked. These ships should be somewhere they can get to sea in minutes, floated out if necessary to be able to do their job. I.17.2

3. Imposed threat to city of San Diego if there is a nuclear accident aboard the ships I.17.3
   A. Ships are in the very center of the San Diego population. If there is a nuclear accident there are only two narrow roads off Coronado. All of the citizens of Coronado are trapped there.
   B. No city government would ever give approval to build a nuclear power plant on Coronado. The U.S. Navy may have the legal right to impose this type of power plant on Coronado but they do not have the moral right to do so.
   C. The Navy points to its good nuclear safety record. I remember there was a U.S.S Thresher that sunk. The Navy may not report publicly but it must have had nuclear "incidents" that have escaped public scrutiny. No system engineered by humans, built by the low bidder, maintained by humans and operated by humans can ever be perfect. A nuclear accident can and will happen The Navy has no right to put the citizens of San Diego at risk to this possibility. Every time the Navy boasts about its safety record they should be required to post the same warning that the SEC requires of the investment industry. **PAST PERFORMANCE IS NO GUARANTEE OF FUTURE RESULTS.**

4. Jobs issues. The need for three Nuclear Aircraft Carriers based on jobs for San Diego and adding to the economy is very risky. When the nuclear accident happens it can be a total human and economic disaster. Short-term economic advantages should never be put before long term potential disasters. The risk is too high. There is low unemployment in San Diego. The economy is stronger than ever despite the dramatically reduced defense budget. I.17.4

5. Navy Credibility is questioned How can any thinking human trust the Navy? Let me cite a few examples: I.17.5
   A. Harbor Dredging. The Navy promised sand for the beaches along the coast. After cost over runs, the need to pollute the air and having to buy air pollution credits and other set backs the only thing delivered to the beaches was live ammunition dredged up from the harbor.
   B. The Navy has already scheduled the home porting of three Nuclear AirCraft Carriers in San Diego. They have master planned and built facilities to service these ships. Therefore the holding of these hearings is a cover up to "be legal" with no intent of really getting input from the citizens of San Diego. If the Navy really wanted the input and public acceptance for home porting these ships toady's hearings would have been held before facilities were built and the harbor was dredged to accommodate Nuclear AirCraft carriers.

SUMMARY I feel very insecure with one Nuclear Aircraft Carrier in San Diego. My personal safety is threatened and the ability of the Navy to defend me in the case of war is diminished. Please find somewhere else in the world to home port these ships.

Sincerely,

Jack A. Brill

Jack A. Brill

I.17

Comment Number	Response

Jack A. Brill

I.17.1 The Navy has never stated that CVNs could not transit the San Diego Harbor Channel under low tide conditions in emergency situations. Sufficient depth exists in San Diego Channels to accommodate emergency situations. CVNs under normal conditions can transit the San Diego channel under all but the lowest of "minus" tides. Since the dredging of the channel and turning basin occurred in 1998, fully loaded CVNs have large windows of sailing times at MLLW or better. The location of three CVNs in San Diego poses no more of a "Pearl Harbor" threat than has existed with the three conventionally powered aircraft carriers homeported there. Please refer to response to comments O.14.6, I.37.1, and I.29.2.

San Diego historically has been homeport to three aircraft carriers (CVs). The proposed action will not cause this number to increase, but only to change the type of aircraft carrier (CVN) homeported at NASNI. Therefore, there would be no change to the strategic value of San Diego as a result of the proposed action. Please also see the response to O.13.27.

I.17.2 Please see response to comment I.17.1. for a discussion of time needed to get San Diego-based CVN underway and out to sea.

I.17.3 The Navy notes the commentor's general opinion regarding the proposed action. However, several points should be noted. First, as explained in section 7.5 of the EIS, NNPP operations and work performed at Naval bases are such that there is no need for unique emergency preparedness programs outside the base. A community near to where nuclear-powered ships are berthed needs no additional emergency planning or response capability beyond that which exists for emergencies from natural events, such as earthquakes or hurricanes.

Second, in section 7.1.4 of the EIS it is stated that "Two nuclear-powered submarines (USS THRESHER and USS SCORPION) sank during operations at sea in the 1960's. Neither was lost due to a reactor accident . . . " Thus, the commentor's assertion that these incidents were related to a failure of a nuclear-related system is not correct.

Finally, the Navy's historical record of safe and responsible operation of nuclear powered warships is discussed in Volume I, section 7 of the EIS. The NNPP pays very close attention to problems and their prevention. The approach taken is to evaluate even the smallest mistake and take appropriate corrective action to preclude recurrence. Working on the small problems helps ensure that larger problems do not occur. Notwithstanding, the Navy does not claim that such a large and complex engineering endeavor has been without problems. Equipment sometimes fails and people do make mistakes. The Navy does not

Comment Number	Response

deny that problems have occurred. However, the facts are that since the inception of the NNPP almost half a century ago, there has never been a reactor accident associated with the Program, nor has there been any release of radioactivity that has had a significant effect on the public or the environment. The approach taken is to evaluate even the smallest mistake and take appropriate corrective action to preclude recurrence. The vast majority of NNPP problems are such that they would not be considered "reportable events" or "abnormal occurrences" under NRC or DOE reporting systems.

I.17.4 Please see response to comment I.5.1.

I.17.5 During the BRAC CVN Homeporting ordnance was discovered within the material deposited on the beach in South Oceanside, California. Subsequent to this discovery, the Navy determined that, due to potential risks to public health and safety, the remaining material would be dredged and disposed at a designated offshore disposal site (LA-5).

A geophysical survey for ordnance has been conducted at Pier J/K. This effort included debris and magnetometer survey with diver and a pile survey to identify location and size of possible debris. Also included was a hydrographic survey of the mitigation site near Pier Bravo. Even with the current available technology there can not be a 100% certainty of identifying buried ordnance.

In response to comments to maximize the beneficial uses of dredged material from the proposed action, the Navy is proposing, as the preferred option, to transport dredged material from Pier J/K and mitigation site to be deposited just south of the Naval Amphibious Base for the creation of intertidal/subtidal habitat. Creation of this enhancement habitat in Navy protected waters is consistent with the Coastal Act and supports the "San Diego Bay Integrated Natural Resources Management Plan". This preferred option would minimize public health and safety risks that may result from ordnance contained in the dredged footprint. Because of this risk near shore and beach replenishment was not considered an alternative. Please see section 2.3.3.1 in the EIS for a discussion of the proposed action.

A site specific explosive safety management plan will be developed in accordance with DOD Directive 6055.9, "DOD Ammunition and Explosive Safety Standards," to minimize the risks if ordnance is discovered.

Final disposal would be in accordance with permit specifications and agency requirements.

A decision was made early in the initial development of this EIS to not use specific aircraft carrier names or hull numbers to identify prospective replacements or decommissionings. This decision was based on the premise that

Comment Number	Response

the Navy's plans can change subject to a variety of uncontrollable circumstances, and nowhere is this more true than with "long range" plans. Consequently, with the exception of the USS ABRAHAM LINCOLN, which is homeported at NAVSTA Everett, Washington, potential specific replacements or retirements were not identified because (1) the EIS proposes the development of *home port facilities* for a particular CVN class, and (2) this approach retained plan flexibility by allowing for substitution of hulls. The LINCOLN could specifically be identified because it was neither a potential replacement nor a decommissioning candidate, but rather the subject of an examination with a focus toward increasing the efficiency of support infrastructure, maintenance and repair capabilities, and the enhancement of crew quality of life (please see section 1.1 of this EIS).

Notwithstanding the discussion above, a chronology of events resulting in the potential replacements for aircraft carriers planned for decommissioning in the San Diego area is provided to help the reader understand how NASNI has customarily been home port for three aircraft carriers.

In the 1980s, the Navy reduced the size of its active aircraft carriers from 15 to 12: six in the Atlantic Fleet and six in the Pacific Fleet. Before that time, NASNI had been the homeport for at least three aircraft carriers. In the early 1970s, this included USS TICONDEROGA, USS KITTY HAWK, and USS CONSTELLATION; in the mid-1970s, USS RANGER, KITTY HAWK, and CONSTELLATION; throughout the 1980s, RANGER, KITTY HAWK, and CONSTELLATION; and in the early 1990s, a combination of USS INDEPENDENCE, (while KITTY HAWK and/or CONSTELLATION were undergoing their Service Life Extension effort in Philadelphia, Pennsylvania), KITTY HAWK, CONSTELLATION, and RANGER. All ships listed above are or were conventionally powered carriers, or "CVs."

In 1993, RANGER was decommissioned at the end of its service life and removed from NASNI, temporarily reducing the port-loading to two CVs. In 1993, a Base Realignment and Closure Commission (BRAC) action resulted in the closure of NAS Alameda, California. Because there were no CVN homeport-capable berths at NASNI, the Navy was allowed to shift both NAS Alameda CVNs to the Pacific Northwest, pending completion of construction of suitable homeport facilities at NASNI. Those facilities were the subject of an EIS entitled *Environmental Impact Statement for the Development of Facilities in San Diego to Support the Homeporting of One NIMITZ Class Aircraft Carrier* (DON 1995a). The actual vessel that fulfilled the BRAC mandate and assumed the role of RANGER was USS JOHN C. STENNIS (CVN-74). Arriving in August 1998, STENNIS took over one CVs worth of facility support infrastructure at NASNI. NASNI has had the historical capacity to support three aircraft carriers.

Comment Number	Response

In 1998, INDEPENDENCE (at that time the Navy's "forward deployed" carrier) reached the end of its service life and was decommissioned. KITTY HAWK was designated as its replacement and left NASNI in July 1998, 20 months after the Notice of Intent for this EIS, and relocated to Yokosuka, Japan. This resulted in a reduction of the port loading at NASNI to two homeported aircraft carriers. The USS NIMITZ is currently undergoing an extended maintenance period on the East Coast and will require a homeport berth within the Pacific Fleet area. Long range plans indicate that the most likely arrival date on the West Coast for NIMITZ would be early 2002. *Were the Preferred Alternative selected,* this would bring NASNI back to its historical three carrier port-loading baseline.

USS CONSTELLATION is expected to reach the end of its service life in approximately 2003. At that time, NASNI would once again experience a reduction in port loading to two homeported carriers *if the Preferred Alternative were selected by the Navy.* The same long range plans addressing NIMITZ also involve replacing CONSTELLATION with the USS RONALD REAGAN. It is anticipated this will happen in 2005. Once again, *if the Preferred Alternative were selected,* it would bring NASNI back to its historical three carrier port-loading baseline.

The closure of Naval Air Station (NAS) Alameda, California, and the relocation of two CVNs to fleet concentrations in San Diego and the Pacific Northwest were carried out in compliance with the 1993 Defense Base Realignment and Closure Commission (BRAC) recommendations. Consequently, the Department of the Navy constructed homeporting facilities for one CVN at NASNI (DON 1995a) and one at Puget Sound Naval Shipyard (PSNS), Bremerton, Washington (DON 1995b). New facilities were needed at NASNI in order to support the homeporting of a CVN, since prior to 1998, there had been no CVNs homeported there. At the time the Navy proposed the construction of facilities at NASNI to support a homeported CVN, the Navy prepared an EIS to present the analysis of potential environmental effects associated with that action. A Final EIS for that project was completed in November 1995. In this Final EIS, the Navy stated, "The proposed action of this EIS does not affect facilities and activities required for the two conventionally powered carriers (CVs) that are currently homeported in the San Diego area. However, as the older CVs are decommissioned, they will be replaced with newer CVNs. Therefore, a decision to establish the capability to support one CVN in the San Diego area makes it reasonably foreseeable that future decisions on where to homeport additional CVNs (CV replacements) beyond the year 2000 could result in their being proposed for homeporting in the San Diego area. This EIS, therefore, considers the potential cumulative environmental impacts of CV replacement and homeporting a total of three CVNs in the San Diego area. The Navy is not, however, developing proposals addressing where to homeport new CVNs beyond the year 2000 at this time. When the Navy does develop such a proposal, it will prepare the appropriate

Comment Number	Response

NEPA documentation." This statement was intended to provide public disclosure of reasonably foreseeable future actions that were not ripe for decision at that time. This is in accordance with 40 CFR 1508.7. The 1995 EIS also states, "This EIS, therefore, considers the potential cumulative impacts of CV replacement and homeporting a total of three CVNs in San Diego." See the 1995 EIS, Volume 1, Chapter 6 (DON 1995a).

The U.S. District Court for the Southern District of California evaluated the Navy's 1995 EIS with regard to the segmentation issue raised by the City. The District Court was aware of the Notice of Intent (December 1996) for this EIS before rendering its decision on the 1995 EIS in May 1997. The District Court concurred with the Navy's implementation of NEPA, and concluded that the Navy had not understated the potential effects of a larger project by preparation of two documents (segmentation). In a Court order dated May 12, 1997, the Court stated, "Because the Court finds that no proposal to homeport three CVNs existed prior to the issuance of the Final EIS, the Final EIS's analysis of the possible cumulative impacts of potential additional home ports suffices under NEPA."

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Andy Dickinson

Address:

COMMENTS:

We have A Reason for us people living here because we are fighting for the safety of ~~our~~ OUR city SAN DIEGO. Would if we do go to WAR with IRAQ or cuba, who knows but the NAVY should not have the nuclear weapons here. If we do ~~we~~ they will go for SAN DIEGO because they know that we have some. Why out of all the ~~City~~ cities of California or on the west coast pacific line why SAN DIEGO. Why shouldn't it be at least north of CALIFORNIA our city has to much history and is very valuable to all the people of SAN DIEGO I.18.1

Signature

10/28/98
Date

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Comment Number	Response

Andy Dickinson

I.18.1 The Navy does not perceive that having three CVNs at NASNI increases the threat from terrorists beyond the potential that has existed for the past several decades. In addition, the robustness of a naval vessel designed to withstand combat damage lessens the potential impact that such an act might incur. The very nature of a military asset diminishes its attractiveness as a target for terrorist. Not only is there a constant posture of security maintained through tightly controlled access and roving patrols, but the ability of the trained "targeted personnel" to react with deadly force increases the risk to the terrorist.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Ana María Estrada

Address: 2005 K St San diego cal 92102

COMMENTS:

Pues yo estoy muy preocupada por los Barcos que an llegado aqui en San diego por el aire estamos afectados por la salud y por las enfermedades del asma de los niños y ansiamos les pedimos comprensión por esa niñes L19

Ana María Estrada
Signature

10/28/98
Date

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CERTIFIED TRANSLATION OF A DRAFT EIS COMMENT

Name: ANA MARIA ESTRADA
Address: 2005 K St. San Diego, CA. 92102

COMMENTS:

WELL, I AM VERY WORRIED DUE TO THE SHIPS THAT HAVE COME HERE TO SAN DIEGO, FOR THE CONTAMINATED AIR, FOR THE HEALTH, FOR THE ILLNESS OF ASTHMA FOR THE CHILDREN AND OLD PEOPLE AND WE ASK FOR YOUR UNDERSTANDING TOWARDS THE CHILDREN. I.19.1

ANA MARIA ESTRADA 10/28/98

Comment Number	Response

Anamaria Estrada

I.19.1 The air quality analysis in the Draft EIS is based on compliance with national and state ambient air quality standards. These standards represent allowable atmospheric concentrations at which the public health and welfare are protected and include a reasonable margin of safety to protect the more sensitive individuals in the population, such as elderly people and children. Since the proposed action alternatives would not exceed any ambient air quality standard, public health would be protected from the effects of the proposed action alternatives. Toxic air contaminants (TACs) emissions from the proposed dredging and disposal actions at NASNI would produce insignificant health impacts to the public.

El análisis de la calidad del aire en el Draft EIS (Estudio de Impacto al Medio Ambiente) está basado en el cumplimiento con las normas de la calidad del aire ambiental nacional y estatal. Estas normas representan las concentraciones atmosféricas permisibles en las cuales el bienestar y la salud publica están protegidas e incluye un margen razonable de seguridad para proteger a los individuos más sensibles dentro de la población, tales como las personas mayores y los niños. Como las acciones alternativas propuestas no excederían ninguna norma de la calidad del aire ambiental, la salud publica estaría protegida de los efectos de las acciones alternativas propuestas. Las emisiones de los contaminantes toxicós del aire (TAC) causadas por el dragado propuesto y por las acciones de deshecho en NASNI, producirían un impacto insignificante en la salud pública.

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: IRV HOSENPUD (USNR)

Address: 1016 CYPRESS WAY
SAN DIEGO 92103

COMMENTS:

I ASKED A FRIEND LAST NITE 10/27/97 IF HE HAD AN OPPORTUNITY TO MOVE TO NORTHERN PORTION OF S.D. COUNTY - NEAR SAN ONFRE NUCLEAR ENERGY STATION — WHERE WOULD HE MOVE? HIS ANSWER — AS FAR AS AWAY AS POSSIBLE 25 - 30 40 MILES.

WITH CVN'S HAVING (2) NUC. REACTORS ON BOARD - ALL OF METRO SAN DIEGO INCLUDING MY HOME ARE WITHIN (4 MILES OF THESE CVN'S.

I. AM WORRIED!

I. AM CONCERNED!

I FELL PROBLEMS MIGHT ARISE!

LITTLE INFO HAS BEEN MADE AVAILABLE RE HEALTH - OF INDIVIDUALS NEAR NUC. FACILITIES

WHAT ABOUT HEALTH — OF PEOPLE?

THANK YOU

I.20.1

Signature

10-27-97
Date

Note: This form is supplied for your convenience. You are not required to use this form. Comments of any length may be submitted to the address on the reverse side of this form. Your comments should be postmarked on or before November 12, 1998.

Comment Number	Response

Irv Hosenpud

I.20.1 There is considerable information contained in the EIS on issues pertaining to the risks associated with radiation exposure and human health. Appendix E provides a summary of a number of studies that evaluated the risks of radiation exposure near Naval Nuclear Propulsion Program facilities. The results of these studies and those contained in Appendix F of this EIS indicate there is no significant radiological risks to the health and safety of the general public as a result of NNPP operations or the proposed action.

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Anita L. Hunter, CNM, ARNP

Address: 1016 Cypress Way San Diego, CA 92103

COMMENTS:

My greatest concern is in the storage of high-level radioactive materials. As a Nuclear Medicine Technologist I am fully aware of the dangers of radioactive materials storage. Dealing with half-lives and storage of those used in Nuclear Reactors - plus the major challenges in an Earthquake prone area. I.21.1

The Point is a community that is still living with the toxic cleanup of Point Isabel, the Gilman Landfill, Brooks Brothers Cleanup - I.21.2

Epidemiology Reports of the Point Loma area - regarding high incidents of Breast + Thyroid Cancers is known to resident physicians - I.21.3

Have you done your Homework in this Regard!

Signature Anita L. Hunter, CNM Date 10-28-98

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Comment Number	Response

Anita L. Hunter

I.21.1 Radioactive waste disposal issues are addressed in sections 3.15.2 and 7.4.3 of the EIS. In addition, a wide range of hypothetical accidents was considered in the development of the analysis presented in the EIS. The hypothetical accidents analyzed indicate risks that are unlikely to be exceeded by other accidents (e.g., airplane crash, earthquake, tsunamis, or terrorism). The results of all the analyses indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

I.21.2 As explained in section 3.2.1, contaminated locations on North Island are in the Navy Installation Restoration Program. The contaminated locations are being addressed in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the National Oil and Hazardous Substance Pollution Contingency Plan, and/or Resource Conservation and Recovery Act (RCRA) Subtitle I.

I.21.3 The Navy knows of no epidemiological reports in the Point Loma area concerning higher incidents of breast or thyroid cancer than normal. However, Appendix E provides a summary of a number of studies that evaluated the risks of radiation exposure near Naval Nuclear Propulsion Program facilities. The results of these studies indicate there is no significant risk to the health and safety of the general public as a result of NNPP operations.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Larry C. Mangelsen

Address: 403 Langley St, Apt. A San Diego, CA 92102

COMMENTS:

My primary concern regarding the stationing of nuclear powered vessels in San Diego is the establishing of the very highest standards of operational safety. Given the lifetime containment difficulties of spent fuel and the potential for operational accidents the safest way to ensure a non-radioactive San Diego and world is to not bring them here and decommission them. I.22.1

A secondary consideration is cost. I believe it is likely that the nuclear Navy has few advantages over a conventionally fueled one as far as the ability to provide fuel during forseeable operations as well. I.22.2

The dredging operations themselves would also stress the bay environment, as the Navy, as well as civilian companies, has contaminated the bay sediments already. I.22.3

Larry C. Mangelsen
Signature

10/28/98
Date

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Comment Number	Response

Larry C. Mangelsen

I.22.1 Our publicly-elected U.S. Congress and President of the United States make programmatic decisions regarding Naval ships (e.g. application of nuclear power), and thus comments regarding these decisions are beyond the scope of this EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

I.22.2 See response to comment O.12.55.

I.22.3 The EIS addresses the potential environmental impacts to present conditions associated with homeporting three CVNs. The impact analysis for San Diego Bay indicated that homeporting is not expected to result in significant adverse impacts to water or sediment quality.

Reproduction clarity limited by quality of comment letter received.

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Leonor Miramontes

Address: 1749 Logan AVE S.D. CA. 92113

COMMENTS:

I.23.1

Mi comentario es que me opongo a que traigan plantas nucleares porque es muy riesgosa y peligrosa para nuestra comunidad donde hay niños y nos afian un mal porque contaminarian el aire y nuestros hijos se enfermaran por eso me opondre para que eso no haya a suceder en la comunidad porque donde quieran poner eso nos opondremos por nuestros hijos que son niños inocentes y no saben del peligro pero uno de adulto ha ver por ellos y por nosotros por eso se lo pedimos que por favor no traigan esas armas gracias

Leonor Miramontes
Signature

10-28-98
Date

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CERTIFIED TRANSLATION OF A DRAFT EIS COMMENT

Name: LEONOR MIRAMONTES
Address: 1749 Logan Avenue San Diego CA, 92113

COMMENTS:

MY COMMENT IS THAT I AM AGAINST YOU BRINGING NUCLEAR PLANTS BECAUSE IT IS VERY RISKY AND DANGEROUS FOR OUR COMMUNITY WHERE THERE ARE CHILDREN AND YOU WOULD BE DOING A BAD EVIL BECAUSE YOU WOULD CONTAMINATE THE AIR AND OUR CHILDREN WOULD GET SICK AND THAT IS WHY I WILL OPPOSE SO THAT IT WILL NOT HAPPEN IN THE COMMUNITY, AND WHEREVER YOU WANT TO PUT THAT, WE WILL OPPOSE IT FOR OUR CHILDREN WHO ARE INNOCENT CHILDREN AND DO NOT KNOW OF THE DANGER AND US, AS ADULTS, WILL OVERSEE IT FOR THEM AND FOR OURSELVES, THAT IS WHY WE ASK YOU TO PLEASE NOT BRING THOSE WEAPONS, THANK YOU I.23.1

LEONOR MIRAMONTE 10/28/98

Comment Number	Response

Leonor Miramontes

I.23.1 A wide range of hypothetical accidents was considered in the development of the analysis presented in the EIS. The hypothetical accidents analyzed indicate risks that are unlikely to be exceeded by other accidents (e.g., airplane crash, earthquake, tsunamis, or terrorism). The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

En el desarrollo de los análisis presentados en el EIS (Estudio de Impacto al Medio Ambiente) se consideró una amplia diversidad de accidentes hipotéticos. Los accidentes hipotéticos analizados indican riesgos que probablemente no sean excedidos por otros accidentes (ejemplo: el choque de un avión, terremotos, maremotos o el terrorismo). Los resultados de todos los análisis, tanto de las operaciones normales como de los accidentes hipotéticos, indican que no existirán impactos radiológicos significativos del puerto base y del mantenimiento de los portaaviones de clase NIMITZ o de operar las instalaciones de mantenimiento para los portaaviones clase NIMITZ.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
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DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: José Miramontos

Address: 1751 Logan AV San Diego. Ca.

COMMENTS:

Mi Comentario es que me opongo a que no acarrien más armas Nucleares ó Toxicos Nucleares pues es peligroso un derrame Nuclear para las Ciudades y colonias de el area. porque podría envenenar el aire y asi Morir milds de personas ó quizas milones entre adultos niños Mujeres y Hombres. y con el Tiempo nos traiga enfermedades a nuestros Hijos al medio ambiente y a nuestra propia Salud. Y por el Vienestar de Nuestra comunidad nos oponemos Rotundamente. que se planten armas Nucleares. por el Vienestar de Cada familia ó Hogar de Nuestra Comunidad. I.24.1

José Miramontos
Signature

10-29-98
Date

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CERTIFIED TRANSLATION OF A DRAFT EIS COMMENT

Name: JOSE MIRAMONTES
Address: 1751 Logan Avenue San Diego CA,

COMMENTS:

MY COMMENT IS THAT I AM AGAINST YOU BRINGING ANY MORE NUCLEAR WEAPONS AND NUCLEAR TOXICS, BECAUSE IT IS DANGEROUS WITH A NUCLEAR SPILL, FOR THE CITIES AND COLONIES OF THE AREA., BECAUSE IT COULD POISON THE AIR AND THOUSAND OF PEOPLE COULD DIE OR MAYBE MILLONS, AMONG ADULTS, CHILDREN, WOMEN AND MEN, AND WITH TIME IT WOULD BRING ILLNESSES TO OUR CHILDREN AND TO THE ENVIRONMENT AND TO OUR OWN HEALTH. AND FOR THE WELFARE OF OUR COMMUNITY WE WILL TOTALLY OPPOSE TO HAVE NUCLEAR WEAPONS, FOR THE WELFARE OF EACH FAMILY OR HOME IN OUR COMMUNITY. I.24.1

JOSE MIRAMONTE 10/28/98

Comment Number	Response

Jose Miramontes

I.24.1 It is the Department of Defense policy to neither confirm nor deny the presence of nuclear weapons at any site.

A wide range of hypothetical accidents was considered in the development of the analysis presented in the EIS. The hypothetical accidents analyzed indicate risks that are unlikely to be exceeded by other accidents (e.g., airplane crash, earthquake, tsunamis, or terrorism). The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

La política del Departamento de Defensa es de ni confirmar, ni de negar la presencia de armas nucleares en ninguna ubicación.

En el desarrollo de los análisis presentados en el EIS (Estudio de Impacto al Medio Ambiente) se consideró una amplia diversidad de accidentes hipotéticos. Los accidentes hipotéticos analizados indican riesgos que probablemente no sean excedidos por otros accidentes (ejemplo: el choque de un avión, terremotos, maremotos o el terrorismo). Los resultados de todos los análisis, tanto de las operaciones normales como de los accidentes hipotéticos, indican que no existirán impactos radiológicos significativos del puerto base y del mantenimiento de los portaaviones de clase NIMITZ o de operar las instalaciones de mantenimiento para los portaaviones clase NIMITZ.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: James Ricker

Address: 4622 Campus Ave SD 92116

COMMENTS:

The Draft EIS for this project is an insult to the intelligence and authority, to the jurisdiction of the people in this matter. I.25.1

As a citizen, taxpayer (your employer) I demand that a new Draft be composed, with full public disclosure of accident statistics and probabilities. I.25.2

- There is no evacuation plan
- There is no believable risk assessment
- The democratic process must be included in making your decision. I.25.3

You are our servants; ACT Like it.

James R. Ricker 10/28/98

Signature Date

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Comment Number	Response

James Ricker

I.25.1 Your comments are noted and are included in the Final EIS.

I.25.2 Please see responses to comments L.4.100, O.10.31, and O.10.34.

I.25.3 This EIS was prepared pursuant to the National Environmental Policy Act, passed by Congress in 1969. The Act requires public disclosure via a scoping notice, a scoping hearing, and a Draft EIS that is made available to the public. The public is then provided the opportunity to comment upon and question the description of the proposed action and the environmental effects. The Navy, as Lead Agency, is responsible for addressing the public's questions and comments in the Final EIS. The public will have 30 days to review the Final EIS before a decision is made. This is the democratic process established by Congress and the Council on Environmental Quality. The Navy believes it has followed all applicable laws and regulations in preparing this EIS.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
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DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Moctezuma Rodriguez

Address: 1911 Harrison Ave San Diego Ca.

COMMENTS:

Todo lo que estamos biendo es causa del Riesgo I.26.1
A/cual en un mañana nos destruira.
Vemos niños mutilados y Deformes
Personas mayores cancerosas
Gracias al uso de la energia atomica
No devemos de permitir esto
Aunque muchas cosas es para el bien mismo
de la ciensia
Estamos espuestos a la contaminación del
aire y del agua.
No mas plantas atomicas mobiles como
son los Barcos. Radioactivos
Gracias por la oportunidad que me dan de
desirlo Gracias.

Moctezuma Rodriguez
Signature

10/28/98
Date

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CERTIFIED TRANSLATION OF A DRAFT EIS COMMENT

Name: MOCTEZUMA RODRIGUEZ
Address: 1911 Harrison Avenue, San Diego CA

COMMENTS:

ALL WE ARE SEEING IS THE CAUSE OF THE RISK THAT ONE MORNING WILL DESTROY US. WE SEE CHILDREN MUTILATED AND DEFORMED, CANCEROUS OLD PEOPLE, THANKS TO THE USE OF ATOMIC ENERGY. WE SHALL NOT PERMIT THIS, ALTHOUGH MANY THING ARE FOR THE GOOD OF SCIENCE. WE ARE AGAINST AIR AND WATER CONTAMINATION. NO MORE MOVING NUCLEAR PLANTS LIKE RADIOACTIVE SHIPS ARE. THANK YOU FOR THE GIVING ME THE OPPORTUNITY OF SAYING IT. I.26.1

MOCTEZUMA RODRIGUEZ 10/28/98

Comment Number	Response

Moctezuma Rodriguez

I.26.1 A wide range of hypothetical accidents was considered in the development of the analysis presented in the EIS. The hypothetical accidents analyzed indicate risks that are unlikely to be exceeded by other accidents (e.g., airplane crash, earthquake, tsunamis, or terrorism). The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

En el desarrollo de los análisis presentados en el EIS (Estudio de Impacto al Medio Ambiente) se consideró una amplia diversidad de accidentes hipotéticos. Los accidentes hipotéticos analizados indican riesgos que probablemente no sean excedidos por otros accidentes (ejemplo: el choque de un avión, terremotos, maremotos o el terrorismo). Los resultados de todos los análisis, tanto de las operaciones normales como de los accidentes hipotéticos, indican que no existirán impactos radiológicos significativos del puerto base y del mantenimiento de los portaaviones de clase NIMITZ o de operar las instalaciones de mantenimiento para los portaaviones clase NIMITZ.

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Sandra Rodrigues

Address: 2058 main ST 157 San Diego Ca. 92113

COMMENTS:

I.27.1

Impacto seria Costas traficos para miles de personas La Tierra seria Infertil NO que daria nada de nosotros personas y animales no sabrian los niños no tendrian un futuro el que lo gara salvarse seria mejor morir como el resto seria Con Cancer deformes seria como es japon seria una maldesión por ambision de algunas personas porque no piensan en algo mejor para la humanidad La nuclear cuando es cosas de paz es bien empleado pero para lo que quieren ustedes es muy malo

Sandra R.
Signature

10-28-98
Date

Gracias Por desir esto

Note: This form is supplied for your convenience. You are not required to use this form. Comments of any length may be submitted to the address on the reverse side of this form. Your comments should be postmarked on or before November 12, 1998.

Para mi y mi familia

CERTIFIED TRANSLATION OF A DRAFT EIS COMMENT

Name: SANDRA RODRIGUEZ
Address: 2058 Main St. 157, San Diego CA 92113

COMMENTS:

THE IMPACT WOULD BE CATASTROPHIC FOR THOUSANDS OF LATIN PEOPLE, THEY WOULD BE INFERTILE, NOTHING WOULD BE LEFT OF US, PEOPLE NOR ANIMALS, THE CHILDREN WOULD HAVE NO FUTURE, THE ONE THAT WOULD SURVIVE, IT WOULD BE BETTER TO BE DEAD, LIKE THE OTHERS, WITH THEIR DEFORMED FACES, LIKE IN JAPAN, IT WOULD BE A CURSE FOR (ILLEGIBLE) OF SOME PEOPLE THAT DO NOT THINK OF SOMETHING BETTER FOR HUMANITY, NUCLEAR FOR PEACE TIME IT IS WELL USED, BUT FOR WHAT YOU WANT IT, IT IS VERY BAD. I.27.1

SANDRA RODRIGUEZ 10/28/98

THANK YOU FOR SAYING THIS FOR MYSELF AND FOR MY FAMILY.

Comment Number	Response

Sandra Rodriguez

I.27.1 A wide range of hypothetical accidents was considered in the development of the analysis presented in the EIS. The hypothetical accidents analyzed indicate risks that are unlikely to be exceeded by other accidents (e.g., airplane crash, earthquake, tsunamis, or terrorism). The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

En el desarrollo de los análisis presentados en el EIS (Estudio de Impacto al Medio Ambiente) se consideró una amplia diversidad de accidentes hipotéticos. Los accidentes hipotéticos analizados indican riesgos que probablemente no sean excedidos por otros accidentes (ejemplo: el choque de un avión, terremotos, maremotos o el terrorismo). Los resultados de todos los análisis tanto de las operaciones normales como de los accidentes hipotéticos, indican que no existirán impactos radiológicos significativos del puerto base y del mantenimiento de los portaaviones de clase NIMITZ o de operar las instalaciones de mantenimiento para los portaaviones clase NIMITZ.

DEVELOPING HOME PORT FACILITIES FOR
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DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Suzanne Rosen

Address: 5872 Kantor St.
San Diego, CA 92122

COMMENTS:

I wish to respectfully submit my request that the Navy postpone its decision to bring more nuclear carriers into San Diego until the matter can be reviewed by the public.

If indeed it is to the benefit of the people both here in San Diego and the nation, then the facts that support this should be clearly presented. Without the support of those involved, there can only be frustration and inefficiency. I.28.1

Again, please postpone this decision so that further research can be documented and widely distributed. I.28.2

Thank You

Suzanne Rosen
Signature

10-28-98
Date

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Comment Number	Response

Suzanne Rosen

I.28.1 The Draft EIS was published on 28 August 1998 and made available to the public for review. The comment period was extended from 45 to 75 days.

I.28.2 Without a request for specific types of additional research and documentation to be conducted, this comment cannot be addressed.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: MEL SHAPIRO

Address: 1050 ESSEX ST SAN DIEGO 92103

COMMENTS:

(1) SAN ONOFRE HAS AN EVACUATION PLAN.
WHY DOESN'T THE NUCLEAR NAVY BASE HAVE ONE?
THE EVACUATION PLAN SHOULD BE PART OF THE EIS. I.29.1

(2) IS IT WISE TO CONCENTRATE ALL CARRIERS IN 1 LOCATION? THIS MAKES AN EASY TARGET FOR AN ENEMY. DISPERSAL IS BETTER STRATEGY. I.29.2

Melvin Shapiro
Signature

10/28/98
Date

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Comment Number	Response

Mel Shapiro

I.29.1 Please see response to comment O.10.31.

I.29.2 The U.S. Pacific Fleet has dispersed its aircraft carrier assets at four different home ports: Puget Sound Naval Shipyard, Washington; Naval Station Everett, Washington; Yokosuka, Japan; and San Diego, California. This geographic dispersal, when combined with deployment commitments, results in few occasions over a period of a year when more than two carriers are co-located at any one port. For further detail on security issues of co-locating more than one carrier in a given location, please see the response to comment L.4.44.

DEVELOPING HOME PORT FACILITIES FOR
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DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: CRAIG SHERMAN

Address: 1901 First Ave #335

COMMENTS:

Draft EIR is deficient in analyzing visual impacts. Essentially all views of Coronado will be lost as viewed from downtown San Diego. What mitigation is being offered to mitigate visual impacts? What economic and tourist interest losses might be realized from decreased views and aesthetics from downtown San Diego? What will happen if a national newspaper picks up on San Diego's "military view" complex? Will tourism and the City's image be lost? What are the cumulative impacts, if and when an air-craft carrier is moored at a museum at the Broadway Pier? I.30.1 I.30.2 I.30.3

Signature

10-28-98
Date

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Comment Number	Response

Craig Sherman

I.30.1 Depending on the alternative selected, views of Coronado may be altered, although impacts would remain below the thresholds of significance identified in section 3.12.2. As stated in section 3.12 under the discussion of operational impacts for each alternative, aircraft carriers have been accepted as part of the NASNI view for decades. It is common for multiple aircraft carriers or other ships to be moored at NASNI (DON 1995a). Therefore, providing capacity to homeport up to two additional CVNs, in conjunction with the decommissioning of two CVs, would not substantially change the existing views of Coronado.

I.30.2 It is difficult to assess the impacts to tourism and visitor spending in the San Diego region due to insignificant changes to the views from downtown San Diego. The presence of Navy facilities, especially vessels have, in themselves, tourist value. The San Diego region has a wide range of tourist attractions (including its proximity to Mexico) and it is unlikely that potential changes in the visual environment at one specific location will measurably impact the level of tourism in the San Diego region.

I.30.3 The creation of a museum for the USS MIDWAY at the Broadway Street Pier has been added to the list of reasonably foreseeable projects in section 3.18. The combination of this project, along with the proposed action and other reasonably foreseeable projects, is addressed in section 3.18.

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Norma Sullivan

Address: 5858 Scripps St. San Diego, Ca 92122

COMMENTS:

On the public hearing Wed. 10-28: a disgrace! Over-flow facilities are routinely provided at this building – 2 large rooms with audio and television. Why not tonight? I.31.1

No air conditioning. The aisles are packed with people which violates the fire safety code.

If this is a measure of the Navy's competence, God save us all –

Norma Sullivan
Signature

10-28-98
Date

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Comment Number	Response

Norma Sullivan

I.31.1 Notification of the meeting location was in compliance with NEPA requirements and the inclusion of a second meeting was in direct response to a request from the community. In addition, the location for the meeting was set in response to a specific request from a local organization. The meeting was conducted in accordance with NEPA requirements and all participants who wanted to speak were provided an opportunity to make comments. Had the Navy been expecting more people as compared to previous meetings involving CVN homeporting, a larger site would have been chosen.

DEVELOPING HOME PORT FACILITIES FOR
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IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Rogelia Urcino

Address: 333 20th S D Cal. 92102

COMMENTS:

I.32.1

Yo estoy muy preocupada acerca de lo que ustedes piensan hacer con sus Barcos de nucleares Porque nuestras playas estan muy Contaminadas y no se puede pescar porque la playa esta muy Sucia y tambien no se puede ni Bañar porque es una cosa espantosa que no se soporta porque es malo para nuestra Comunida pero el pueblo unido siempre estara y espero que todos los Comentarios las escuchen y mediten antes de tomar las Iniciativas y piensen en lo peligroso que es  

Rogelia Urcino
Signature

10/28/98
Date

Note: This form is supplied for your convenience. You are not required to use this form. Comments of any length may be submitted to the address on the reverse side of this form. Your comments should be postmarked on or before November 12, 1998.

CERTIFIED TRANSLATION OF A DRAFT EIS COMMENT

Name: ROGELIA URCINO
Address: 333 20TH , San Diego CA 92102

COMMENTS:

I AM VERY WORRIED ABOUT WHAT YOU THINK OF DOING WITH YOUR NUCLEAR SHIPS, BECAUSE OUR BEACHES ARE VERY CONTAMINATED AND ONE CAN NOT FISH BECAUSE THE BEACH IS VERY DIRTY AND ALSO ONE CAN NOT SWIM BECAUSE IT IS A HORRIBLE THING THAT CAN NOT BE PUT UP WITH, AND IT IS BAD FOR OUR COMMUNITY, BUT THE PEOPLE ALWAYS WILL BE UNITED AND I HOPE THAT YOU LISTEN TO ALL THE COMMENTS AND YOU THINK BEFORE TAKEN ANY INITIATIVE AND THINK HOW DANGEROUS IT IS. I.32.1

ROGELIA URCINO 10/28/98

Comment Number	Response

Rogelia Urcino

I.32.1 The EIS explains how the proposed action of providing capacity to homeport up to two additional CVNs at NASNI would not result in significant, unavoidable impacts on beaches and fishes.

Dredging of an estimated 582,000 cubic yards (cy) of bottom sediments from areas adjacent to and immediately offshore from the wharf would be required. Dredging would be conducted in accordance with permit specifications and other requirements of EPA, U.S. Army Corps of Engineers, and RWQCB Permit conditions that specify: specific dredging equipment, water quality monitoring, barge disposal monitoring, and a debris management plan. Dredging operations would not cause long-term changes in dissolved oxygen concentrations or in other water quality characteristics because sediments suspended during dredging would settle to the bottom, and natural mixing processes would reduce any other localized changes to water quality, within a period of several hours after dredging stops. Based on extensive tests and modeling completed by the Navy, sediment caused during dredging would not create significant releases of chemical contaminants, and would not kill marine animals including fish. Excavation for the new pier and dike would cause similar short-term impacts that would not significantly affect water quality of marine animals. Construction would cause shock waves from pier pile driving, causing fishes to temporarily leave the activity area. Most fish are very mobile and would be able to avoid the construction area. This effect would be short-term and less than significant. Floating barriers (booms) would be placed around the construction site to ensure that any accidental release of debris during construction would be contained so that it would not float onto local beaches.

When in port, the homeported carriers would be surrounded by a floating boom to contain any materials accidentally released. The booms would also help in clean up efforts. Emergency response and clean-up plans are required and would rehearsed to ensure that effects from any spills would be minimized.

Therefore, the proposed action to provide capacity to homeport additional CVNs would not pose a significant impact to area beaches and fish.

El EIS (Estudio de Impacto al Medio Ambiente) explica como la acción propuesta para proveer capacidad como puerto base para hasta dos más CVN's en el NASNI, no resultaría en inevitables y significativos impactos a las playas y a los peces.

Se requeriría el dragado de aproximadamente 582.000 yardas cubicas (cy) de sedimentos de fondos de las áreas adyacentes y de las que están inmediatamente afuera de la costa cerca del muelle. El dragado sería llevado a cabo de acuerdo a las especificaciones de los permisos y de otros requisitos por parte de EPA, el cuerpo de ingenieros del Ejército de

Comment Number | **Response**

Estados Unidos, y las condiciones del Permiso y RWQCB que especifica: el equipo especifico de dragado, el control de la calidad de agua, el control del desecho por las dragas, y un plan de administración de residuos. Las operaciones de dragado no causarían cambios a largo plazo en las concentraciones de oxígeno disuelto ni en otras características de la calidad del agua, porque los sedimentos suspendidos durante el dragado se estabilizarían en el fondo y los procesos naturales de mezcla reducirían todo otro cambio localizado en la calidad del agua dentro de un período de varias horas después que se pare de dragar. Basándose en extensos análisis y modelos completados por la Marina, los sedimentos causados durante el dragado no crearían descargas significativas de contaminantes químicos, y no mataría los animales marinos, incluyendo los peces. La excavación para un nuevo muelle y dique causaría impactos similares de corto plazo que no afectarían significativamente ni la calidad del agua ni a animales marinos. La construcción causaría ondas de impacto al clavar las vigas del muelle, causando que los peces se alejaran temporalmente del área de actividad. La mayoría de los peces tienen mucha movilidad y podrían evitar el área de construcción. Este efecto sería de corto plazo y mucho menos que significativo. Las barreras flotantes (booms), serían puestas alrededor del lugar de la construcción para asegurar que toda descarga accidental de residuos durante la construcción quedarán contenidos para evitar que floten hacia las playas locales.

Cuando estuvieran en el puerto, los portaaviones del puerto base estarían rodeados por barreras flotantes para contener todo material descargado accidentalmente. Estas barreras flotantes también ayudarían en los esfuerzos de limpieza. Las respuestas de emergencia y planes de limpieza son requeridos y serían practicados para asegurar que los efectos de todo derrame fueran minimizados.

Por lo tanto, la propuesta acción de proveer capacidad para adicionales CVN en el puerto base no causaría un impacto significativo a las playas y a los peces del área.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: LAURETTE VERBINSKI

Address: 8871 CLIFFRIDGE AVE
LA JOLLA, CA 92037

COMMENTS:

NO, NO, NO -
SAN DIEGO IS TOO
BIG AN URBAN AREA
FOR NUC. CARRIERS
TO BE SO CLOS-

I.33.1

Laurette Verbinski
Signature

10/28/98
Date

Note: This form is supplied for your convenience. You are not required to use this form. Comments of any length may be submitted to the address on the reverse side of this form. Your comments should be postmarked on or before November 12, 1998.

Comment Number	Response

Laurette Verbinski

I.33.1 Your comments are noted and are included in the Final EIS.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Hector Yuriar

Address: _____

COMMENTS:

We should not have nuclear carriers because no matter what they say it's not safe. It better to not have one dead than one deaf. No more nuclear waste please we will fight. I.34.1

Signature

10/28/98
Date

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Comment Number	Response

Hector Yuriar

I.34.1 Please see response to comment I.22.1.

I.35.1

The Navy Is All Wet

The Navy is all wet
It hasn't happened yet.
Why do we all fret?

Imagine our sixth largest city.
It would be a pity.
If this lovely, temperate place
Became a barren space.
Contaminated by nuclear waste.
Please take heed post haste.
It would take one small mistake
To create a nuclear wake.
It fills my heart with fear.
Because, it could happen here.
The navy is all wet.
No, it hasn't happened yet.
Nuclear carriers must go
Before disaster strikes, you know.
Please do not forget.
Leave no room for regret.

Ruth Picarsky-Benjamin
San Diego, California 10.98

Comment Number	Response

Ruth Pickarsky-Benjamin

I.35.1 Please see response to comment I.4.1.

1780 Avenida del Mundo
#404
Coronado, CA 92118

Naval Facilities Engineering Command
(Code 05AL.JC)
1220 Pacific Highway
San Diego, CA 92132-5190

Gentlemen:

Please record the position of this Corondao family as being in favor of the proposal to make North Island the home port for three nuclear powered carriers. I.36.1

We believe that this proposal is in the best interests of both the community and the nation.

Sincerely,

Ed and Genie Sack

Comment Number	Response

Ed and Genie Sack

I.36.1 Your comments are noted and are included in the Final EIS.

Southwest Division, Naval
Facilities Engineering Command
Code 05AL.JC
1220 Pacific Highway
San Diego, CA 92132-5190

November 3, 1998

Mr. Jim Bell
P.O. Box 7453
San Diego, CA 92167

Subject: *Message left on the CVN Draft EIS Information Line*

Dear Mr. Bell:

We have received your comment you recorded on the Homeporting Draft EIS information line, and have summarized it as follows.

> I'm voicing my total opposition to the Homeporting idea. I'm questioning the stationing of any nuclear vessels in and around the heart of San Diego. Beyond the potential for accidents, I feel that because of the danger of terrorism worldwide, this could create a target for terrorists. Sinking a large ship at the mouth of the Bay could prevent any carriers from leaving port. This is not good from either a military or civilian perspective to protect the civilians in this country and Mexico, and does not make any sense... "Please reconsider this. This is nuts." I.37.1

We suggest that you submit your comments in writing for accuracy. Written comments must be received by November 12th, 1998. Please send them addressed to my attention at the address above. You may also fax your comments to (619) 532-4998. You may also submit your comments by email, to: CVN_HOMEPORTING@efdswest.navfac.navy.mil.

Thank you for your perspective.

Yours truly,

John Coon

Comment Number	Response

Jim Bell

I.37.1 It is beyond the scope of this environmental document to hypothesize on a theoretical scenario involving terrorist activities in the San Diego area. In addition, the Navy does not perceive that having three CVNs at NASNI increases the threat from terrorists beyond the potential that has existed for the past several decades. The robustness of a naval vessel designed to withstand combat damage lessens the potential impact that such an act might incur. The very nature of a military asset diminishes its attractiveness as a target for terrorist. Not only is there a constant posture of security maintained through tightly controlled access and roving patrols, but the ability of the trained "targeted personnel" to react with deadly force increases the risk to the terrorist.

The Navy, throughout its long history of homeporting dozens of ships in San Diego Bay, has evaluated the risk of having its ships, regardless of the ship's type of propulsion, "trapped" inside the Bay, and found that risk to be acceptable. This EIS analyzes the impact to the environment of the construction and operation of facilities to support homeporting three CVNs; the same number of aircraft carriers that have been homeported in Coronado for decades.

October 26, 1998

3930 Park Blvd.
San Diego, CA 92103
(619) 296-6713

John Coon, Project Manager
Southwest Division, Naval facilities, Engineering Command
Code 05AL-JC
1220 Pacific Highway
San Diego, CA 92132

Dear Mr. Coon:

I am extremely concerned about the Navy's plans for nuclear-powered aircraft carriers in San Diego. North Island Naval Air Station sits in the middle of a major metropolitan area. The homeporting of two more nuclear carriers in San Diego poses a serious public health and safety threat. It results in too many nuclear reactors too close to too many people. I.38.1

Please measure the water quality in areas surrounding Naval Air Station North Island to ensure the safety of the public. This water will have to be measured regularly to ensure that the marine environment is kept free of pollutants from NASNI. I.38.2

Also, I want assurance that hazardous waste storage facilities on NASNI will be used solely for the base generated wastes and not for wastes generated from off-base facilities. I.38.3

In the event of an accidental release of radioactive material into the environment, I want assurance that the Navy will notify local and state agencies. I want assurance that contingency plans to ensure the safety of the population in affected areas have been developed. I.38.4

With its decision to bring nuclear-powered aircraft carriers into San Diego, the Navy has assumed tremendous responsibilities. The Navy must take every step to ensure the safety of the millions of residents who live in San Diego. I.38.5

Respectfully,

Jason A. Folkman

Jason A. Folkman

Comment Number	Response

Jason A. Folkman

I.38.1 Your comments are noted and are included in the Final EIS. Please see response to comment I.4.1.

I.38.2 Any requirements for, and the scope of, monitoring would be determined by the regulatory agencies through the permitting process. However, evaluations in the EIS concluded that no significant impacts would occur to water and sediment quality.

I.38.3 The State of California, Department of Toxic Substance Control (DTSC), permits the hazardous waste storage facilities at North Island for operation. That permit allows wastes generated at other Navy facilities to be stored at the North Island facility. The Mixed Waste Facility at NASNI will only be allowed to temporarily store small amounts of mixed waste from SUBASE San Diego pending shipment to permitted treatment, storage and disposal facilities. Issues concerning storage and shipment of Non-CVN generated hazardous wastes to and from NASNI are not part of the proposed action.

I.38.4 Please see responses to comments O.10.31, O.12.33, and O.12.81.

I.38.5 Your comments are noted and are included in the Final EIS.

October 28, 1998

Janet M. Hatch
816 Olive Avenue
Coronado, California 92118

Sir,

As a 30 year resident and voter of the city Coronado, I wish to object to the addition of two nuclear aircraft carriers stationed at NAS North Island. I.39.1

My reason is 3 carriers in this small town will severely impact an already impossible traffic problem with its attendant air pollution, noise, etc. I.39.2

The added naval personnel adds very little to our city's economy. Why? I.39.3

Simply stated, they cannot afford Coronado prices. I, a retiree, am hardly making it myself! I.39.3

Our Naval sources state that a nuclear accident while a ship is in port is very remote. Perhaps, but statistics over the centuries show accidents do happen! I.39.4

Please give this letter serious consideration to those of us who do not wish any nuclear carriers in our area. I.39.5

Yours truly,

Janet Hatch

Comment Number	Response

Janet M. Hatch

I.39.1 Your comments are noted and are included in the Final EIS.

I.39.2 Your comments are noted and are included in the Final EIS. For information on the transportation, air quality, and noise analysis please see response to comments L.2.2, O.12.141, and L.4.29, respectively.

I.39.3 Your comments are noted and are included in the Final EIS. The Navy concurs with the commentor's statement that the added Naval personnel would add very little to the City's economy. As stated in section 3.8.2.3, providing the capacity to homeport two additional CVNs would result in 3,319 additional military personnel to the region.

I.39.4 Your comments are noted and are included in the Final EIS. Please see response to comment I.22.1.

I.39.5 Your comments are noted and are included in the Final EIS.

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Tom Dawson

Address: 708 E Ave Coronado Ca 92118

COMMENTS:

I AM AGAINST THE USE of NUCLEAR POWER. THE "CONS" OUT WEIGH THE "PROS". WHAT COST FOR POWER?; TO POISON THE ENVIRONMENT WITH SUBSTANCES SO LETHAL AS TO BE DEADLY FOR THOUSANDS OF YEARS?. NUCLEAR POWER, NUCLEAR WASTE And Life ARE A DEADLY MIX WITH Life COMING OUT THE ~~LOSER~~ LOSER. I.40.1

THE UNITED STATES WOULD SERVE THE WORLD And IT SELF BETTER ~~BY~~ DEVELOPING ALTERNATIVE POWER SOURCES FROM RENEWABLE SUPPLIES. I.40.2

PERSONALLY, WHERE NUCLEAR IS, IS WHERE I don't want to be. So, because of THE NUCLEAR build up in THIS AREA (SAN DIEGO) THIS will MEAN The loss of MY BUYING POWER And TAX DOLLARS ... IN THE NEAR FUTURE. I.40.3

T. N. Dawson
Signature

11. 03. 98
Date

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Comment Number	Response

Tom Dawson

I.40.1	Your comments are noted and are included in the Final EIS. Please see response to comment I.22.1.
I.40.2	Your comments are noted and are included in the Final EIS. Please see response to comment I.22.1.
I.40.3	Your comments are noted and are included in the Final EIS.

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Khatara Morgan

Address: 708 E Ave. Coronado, Ca. 92118

COMMENTS:

I am strongly opposed to your bringing more "Nuclear" anything to this densely populated area - San Diego - North Island.

We already have more than enough here of "Nuclear" submarines & aircraft carrier. This adds a burdon of toxicity to our enviroment. It all adds up! I don't believe in "Nuclear" power. The costs (long term radiation problems, monetary costs, extra care, wastes) just don't out weigh the benefits.

Is this the legacy we will leave our children & their children? The Native American Indians have a saying "How will this "affect" for Seven Generations." We must begin to think along these lines.

The people here are saying no to this. We are supposed to live in a democracy. You do have the power to "turn the ship around" & go back. We just don't have the time or options to play around with & make mistakes with Nuclear Radiations.

I.41

Signature Khatara Morgan

Date Nov. 3, 1998

Note: This form is supplied for your convenience. You are not required to use this form. Comments of any length may be submitted to the address on the reverse side of this form. Your comments should be postmarked on or before November 12, 1998.

Comment Number	Response

Khatara Morgan

I.41.1 Please see response I.22.1.

November 5. 1998

To: Mr. John Coon, Project Manager--Code 05AL-JC
Southwest Division, Naval Facilities Engineering
FAX (619) 532-4998

From: Ms. Sally Beynon, US citizen and 36 year resident of San Diego
FAX & phone (619) 223-8583

Re: Comment on the Draft Environmental Impact Statement (DEIS) for two more nuclear aircraft carriers to be homeported in San Diego Bay.

I have lived in San Diego most of my adult life. My family and friends are here. I, and almost everyone with whom I have discussed the matter, are horrified that the Navy is proposing to homeport two additional nuclear aircraft carriers here as well as to create new radioactive waste treatment and storage facilities on North Island and at the Point Loma Submarine base. I.42.1

Through the Peace Resource Center and the Environmental Health Coalition, I have received information describing recent naval nuclear accidents culled from Navy records. I have also seen the findings of the recent Government Accounting Office report that found that in spite of incredible costs, nuclear carrier provide no military advantage. I.42.2

The Navy's DEIS for the two additional carriers does not include much necessary information about its accident record or emergency response plans, nor did it respond to issues raised by our community including concerns relating to environmental justice in an already polluted environment or requests for baseline health studies and air monitoring. I.42.3

It seems that under the guise of protection (which would appear to be unnecessary and without military advantage) the Navy is endangering our health and our lives, not to mention wasting our tax dollars. I am totally opposed to this proposal and am committed to alerting all with whom I come in contact to the situation and the publically available information on the hazards we would face should the proposal become reality. I.42.4

Comment Number	Response

Ms. Sally Benyon

I.42.1 The scope of this EIS does not include creating new radioactive waste treatment and storage facilities at North Island. As described in response O.12.69, issues associated with constructing and operating the NASNI Depot Maintenance Facility were analyzed in reference DON 1995, and are beyond the scope of this EIS. In addition, issues associated with constructing and operating facilities at SUBASE San Diego were analyzed in reference DON 1998b, and are addressed in section 6.18, Cumulative Impacts.

I.42.2 Please see responses O.12.12 and O.12.33.

I.42.3 The purpose of the environmental justice analysis is to determine whether there would be a disproportionate effect on a minority or low-income population. The environmental justice section related to San Diego, section 3.17, discusses Coronado as the relevant sub-regional area, since this community is adjacent to, and closest to areas impacted by the proposed action. The community of Coronado is comprised of relatively few minorities and low income households (see Table 3.17-1 in Volume 1). Based on this analysis, there is no reason to conclude that minorities or low income communities would be affected disproportionately. Any impacts from air quality, traffic, security, construction, earthquakes, and personnel loading would primarily affect the residents of Coronado; these impacts would also be less than significant, as discussed in the relevant sections of the Draft EIS. Finally, as indicated in section 3.10, air quality impacts would be below thresholds of significance and would therefore not be expected to increase respiratory or other illnesses. In absence of significant environmental impact except for localized areas around NASNI, the EIS concluded that there would be no disproportionate effects on minority or low income populations." For further detail, please see responses to comments O.10.31, O.12.33, O.12.101, and L.4.36.

I.42.4 Your comments are noted and are included in the Final EIS.

MARILYN G. FIELD
1101 FIRST STREET, APT. 208
CORONADO, CA 92118
TEL: (619)437-6553
FAX: (619)522-0521

November 12, 1998

Mr. John Coon (Code 05AL.JC)
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego,California 92132

RE: Comments on the DEIS for Developing Home Port Facilities for Three Nimitz-Class Nuclear Powered Aircraft Carriers in Support of the U.S. Pacific Fleet

Dear Mr Coon:

I.43

I have several comment on the above captioned DEIS ("DEIS"). I begin by pointing out that the purpose of a Draft Environmental Impact Statement as required by the National Environmental Policy Act ("NEPA") is to provide full and frank disclosure of the environmental impacts and risks of a proposed project so that citizens and politicians can make informed decisions about its acceptability. The DEIS, because of the problems noted in this letter, as well as the problems noted in the comment letters on the DEIS filed by The Environmental Health Coalition and the City of Coronado, fails to perform this fundamental purpose of disclosure. Accordingly, this letter must insist, in order to fulfill the purposes required by NEPA, that the questions and issues raised by this letter and the comment letters submitted by the City of Coronado and The Environmental Health Coalition be fully, frankly and comprehensively dealt with in a revised Draft Environmental Impact Statement circulated again for comment in accordance with the requirements applicable to Draft Environmental Impact Statements, including the required public hearings. Because of the fundamental nature of the disclosure inadequacies noted in this letter, it is only through this reanalysis, revision, reissuance and recirculation process that the public can be informed enough to make decisions about this project, including what mitigations, if any, might make this project acceptable. I.43.1

Reissuance of a DEIS in draft form is not unknown and in fact is clearly required under CEQA when a draft environmental impact report (the State equivalent of a draft environmental impact statement) does not meet the disclosure standard required by CEQA. Please see Laurel Heights v. Regents of California, 6 Cal 4th 1112 (1993) in which the Supreme Court of the State of California held that a draft environmental impact report must be redone and recirculated if it is seriously deficient. CEQA is applicable in this situation because the DEIS is is also serving to meet the requirements of CEQA. The DEIS is seriously deficient and does not meet the disclosure requirements of CEQA and NEPA for the reasons stated in this letter and in the comment letters filed on the DEIS by The Environmental Health Coalition and by the City of Coronado. I.43.2

Moreover, the DEIS represents just one stage of a larger project: the reconfiguring and expansion of the Navy's presence in and around San Diego Bay. This reconfiguring and expansion commenced several years ago with the Draft Environmental Impact Statement for the Stennis and the associated support facilities, continued with the decommissioning of the McKee and the construction of a shore based facility for submarine maintenance and continues now with this DEIS. Contrary to the purposes and the requirements of NEPA, the Navy has divided this enormous reconfiguring and expansion project into smaller segments which has the effect of minimizing their impact and subverting the NEPA process which is suppoed to give the public a chance to evaluate the total impacts and risks of a proposed project in advance. The DEIS should now be revised to now perform this function by disclosing the impacts of the entire project against the pre-Stennis baseline. It is only in this way that the public can be informed and understand the total impacts and risks of this project. I.43.3

My specific comments commence with comments on Appendices E and F. I start by noting that these Appendices are extremely difficult for a lay person to understand. I suspect there are few people in San Diego who have had the time or patience to struggled with it as I have and that most people do not understand it and instead rely on the reassuring probability statistics thrown out by the Navy at its public meetings. These statisics are highly misleading and greatly understate the risks for several reasons: I.43.4

1. In all the risk probability analyses ,except possibly one,the risk has been calculated by multiplying the assumed risk by the Navy's own estimate of the probability of an accident.(See page F-1, line 14 et. seq.). The Navy assumes this probability is an extremely tiny fraction (5 x 10 to the minus three power) (See page F-19, line 11 et. seq.). (How the Navy arrives at this probability factor is not clear.) The effect of this is to greatly understate the risk if an accident occurred, i.e., if you multiply anything by a tiny fraction, the end result is a tiny number. But what citizens deserve to know is what the risk is to them if there is an accident. The numbers should be restated to back out this probability factor.

2. The one set of tables (Table F-9 and Table F-11)that may back out the probability factor are incomprehensible to the average person, including the average person with an advanced degree who has spent time studying them. This means that they fail in their function of informing the public about an essential feature of the project, i.e., the degree to which they may have a higher cancer risk as a result of this project. In Table F-9, the risk to a maximally exposed off site individual at NASNI is stated to be 1.0 x 10 to the minus 4 power. This is meaningless to the average person. This analysis should be restated in language that people can understand. I.43.5

3. The risk analyses present the cancer risks of radiation exposure in terms of the average ANNUAL risk. People need to know what their risk is of developing cancer during their lifetime, not the risk in any given year. The Navy method of calculation again greatly understates the cancer risk. Citizens need to know and deserve to know the truth about the cancer risk caused by this project. The new DEIS must recalculate the data to show lifetime risk rather than average annual risk. I.43.6

4. The risk analyses show the risk of FATAL cancers, not total cancers. Again, this understates the risks. The Navy must restate the analyses to include all cancers. I.43.7

I.43

5. The risks of adverse health effects other than cancer should also be disclosed. I.43.8

6. The cancer risk assumptions used in Appendix F and described in Appendix E do not reflect current scientific thought about the cancer and other adverse health consquences of ionizing radiation at much lower doses than previously thought. In September of this year I attended a scientific symposium on the health effects of low level radiation at the New York Academy of Medicine. Although this is a field is which some controversy exists, the findings of most of the papers presented were that cancer risks exist at much lower levels than previously thought.(See the comments of Dr. David Richardson submitted to the Environmental Health Coalition dated 10/20/98 enclosed herewith.) Whether or not the Navy agrees with this research, in a disclosure document of this nature, it is misleading not to at least acknowledge it and analyze the data on the basis of this more current research as well. Because the DEIS does not take the higher risk factors implied by current scientific thought into account, the Navy's risk calculations again may greatly understate the cancer risk. Appendices E and F should be redone using these more current and conservative risk assumptions. I.43.9

7. The DEIS risk analyses model only two modest accidents, including only one accident involving an airborne release of radioactivity. There are many other possibilities for accidents, such as airborne radioactive steam from a carrier's reactor (such as happened in the Puget Sound accident); sabbotage (such as happened in the Groton, Conn. submarine base where the wires to I.43.10

the fuel rods which control the reactor were almost severed); a spill of radioactive primary coolant on land while it is in the process of being transported from the carriers to the radioactive waste reprocessing plant; an earthquake on the faults that are right next to this operation that caused the radioactive waste storage facility and/or the radioactive waste reprocessing plant to collapse or the loosely compacted landfill on which part of this project is located to liquify; a reactor going critical (the Navy must explain if the carrier could be towed out to sea at low tide and how they would persuade the civilian operated tugboats to maneuver it out of the Bay). The DEIS must set forth all possible serious accident scenarios and they must be modeled using worst case assumptions. I.43.10

8. The meteorology assumptions are not clear. The DEIS says it assumes 95% worst case meteorology. What does this mean? For Coronado, the worst case meteorology is the prevailing winds which blow from the base towards Coronado residences 87% of the time. Do the Navy analyses assume the worst case is winds blowing toward Coronado or winds blowing towards downtown San Diego (which might be considered worst case by the Navy because it would expose a larger population)? If the analyses assume the wind is blowing towards San Diego, does it understate the risk of the maximally exposed individual living in Coronado? I.43.11

9. I note that Appendix F describes the Navy's plans to evacuate NASNI within two hours in the event of a radiological accident, including practice drills, but there are no such plans for the residents of Coronado or San Diego. There is only a vague statement on page F-6, line 11 et. seq. about "emergency response" and communications with state and local authorities. This is obviously inadequate. I point out that the Navy has refused to release its emergency response plans for a San Diego Radiological Emergency in response to a FOIA request by the Environmental Health Coalition on the ground that it is classified. This is unacceptable. Emergency plans which are not well known and well rehearsed are not effective. I further note that neither the Navy nor the cities surrounding the Bay currently have any means to even notify residents in the event of a radiological emergency, which unlike most other types of emergencies, would not necessarily be apparent to people. You may recall that it was several days before the residents surrounding Three Mile Island were notified of the radiation hazard and, because radiation is invisible and odorless, they were unaware of it until notified. Moreover, it would be simply impossible to evacuate the population of Coronado in any reasonable time frame in view of its limited means of egress, especially since the Navy would apparently be using these limited means of egress to evacuate North Island at the same time. And it may be impossible to evacuate anyone at all from Coronado if a radiological release occurred at the same time as, or was caused by, an earthquake which also rendered the bridge and/or the Strand road impassible. Moreover, it is virtually impossible to conceive of how the enormous metrpolitan area of San Diego could be evacuated in the I.43.12

event of an emergency in view of the fact that the existing roadways are barely able to handle the traffic of a normal rush hour and in view of the fact that Coronado and North Island would be evacuating at the same time. Moreover, there are no known evacuation plans and no means to communicate such in the event of an emergency.

10. All that most citizens know about the radiation risk to which they may be exposed in connection with the nuclear carrier homeporting is the reassuring "negligible risk" statistics presented at the Navy hearings, i.e., cancer risk of 1 in 2 billion. This number (Table F-1, page F-2) not only is dramatically understated by the factors described above, it is the AVERAGE annual risk of a fatal cancer of all people living in a 50 mile radius of the project. This number dilutes the risk by averaging in the enormous population of Tijuana to the South and the highly populated areas to the North and West of San Diego, and by assuming that the risk of upwind populations is the same as downwind populations, and assumes NORMAL operations,i.e., NO ACCIDENT. Even the companion maximally exposed individual risk factor of 1 in 19 million assumes NORMAL operations. Appendices E and F must be redone to make it clear to citizens and the cities surrounding San Diego Bay what the true risks are.

11. It is not clear what distance assumption has been used to calculate the risk to the MOI, i.e., the most exposed off base person. The assumed distance of the MOI must be stated and the exact distance of the Base boundary from the closest element of the project, which I believe is the carriers, be used. I suspect that inappropriate distance assumptions were used because the non-worker on-Base population is shown to have a higher risk that the closest Coronado resident, but in fact, residents of Coronado are closer to the carriers than most on-Base residents and workers. If the assumed distance has been estimated from the reprocessing plant rather than the carriers (the carriers could be the locus of an accidental release of radiation just as happened in Puget Sound where a Navy nuclear vessel in port with the reactors turned off released a cloud of radioactive steam) or the distance to residences been overstated, this would again operate to understate the risk to residents. Instead of considering the MOI figures as the relevant statistics, Coronado residents may be exposed to the risk of the on-Base population, or greater, since Coronado residents are actually closer to the carriers than the on- Base population. (Again, I note that the on-Base population has evacuation plans and Coronado residents do not, possibly based on these assumptions which would not seem to be correct.)

12. I am enclosing with this letter a list of questions submitted to Richard C. Guida of the Navy's nuclear propulsion program in connection with a meeting held in Coronado several years ago. These questions were not answered at that meeting or since. The new DEIS should address these questions. The answers to these questions are essential to permit citizens to evaluate

I.43

I.43.12 I.43.13 I.43.14 I.43.15

their risk.

13. I am also enclosing a document relating to the overwork conditions that caused the Mystic accident several years ago when mercury was accidently dumped into San Diego Bay, in front of the very turning basin where the carriers will park. This accident was caused by an overworked and fatigued crew. (This document was obtained through a Freedom of Information Act request by The environmental Health Coalition.) The Navy's recruiting and retention problems have been much in the news of late. The new DEIS should indicate how the personnel shortages caused by these problems may intensify the likelihood of accidents, explaining the extent to which the Nuclear Navy is currently experiencing personel shortages, how these shortages are likely to intensify and how the Navy compensates for those shortages, through overtime work,etc. The new DEIS should explain what safeguards the Navy has in place to avoid the conditions of fatigue that caused the Mystic accident. It should also explain why safety procedures failed in the Mystic accident. The Navy should release the "lessons learned report" from this accident.

14. The new DEIS should include a guarantee that the carriers will not be defueled or refueled in Coronado/ San Diego Bay at any time in the future or in the alternative, state that defueling and refueling may be done here and set out fully and frankly the risk that this extremely hazardous operation would pose to surrounding populations.

15. I have enclosed drafts of two letters addressed to The Environmental Health Coalition, one from Camille Sears dealing with Appendices E and F and other air toxics issues and the other from the Institute for Energy and Environmental Research dealing with Appendices E and F. The final versions of these comment letters are filed with the November 12, 1998 comment letter of The Environmental Health Coalition on the DEIS and are incorporated herein by reference. The issues and questions contained in these letters should be fully addressed in the new DEIS.

16. The new DIES should include a description of the "collection tanks" referred to in Appendix F which might result in one of the accidents modeled in the DEIS and explain how the radioactive liquid will be transferred from the nuclear powered aircraft carrier to the collection tanks and what is then done with the radioactive liquid in the collection tanks, including how it is transported for reprocessing or storage. The DEIS should also describe what conditions could cause the tanks to rupture and what the safeguards are to prevent such an accident.

17. The new DEIS should also describe how radioactive liquids and solids will be transported to and from the vessels to the Controlled Industrial Facility and the radioactive waste storage facility and the conditions under which the transport process could result in an accidental release of radioactivity.

I.43.15 I.43.16 I.43.17 I.43.18 I.43.19

18. The new DEIS should fully explain whether and under what cicumstances radioactive solids or liquids or toxic chemicals will be brought into North Island from facilities located elsewhere, the names and locations of the sources of radioactive or chemical wastes that may be brought to North Island and what conditions could result in an accidental release of radiation or toxic chemicals during the transport or transfer process. I.43.20

19. The DEIS should state definitively that there will never be a dry dock constructed at North Island. A statement of present intention is insufficient inasmuch as present intention could change the day after the DEIS became final. I.43.21

20. The DEIS should describe all expected and routine releases of radioactive steam or gases (including, but not limited to, xenon, krypton and tritium) into the air and the possible adverse health consequences which could be caused by exposure thereto. I.43.22

21. The Navy should state in the new DEIS that the Navy will immediatly notify citizens in surrounding communities of any and all accidental releases of radiation and will permit independent testing to verify the amounts released. The DEIS should state that the Navy will notify citizens in advance of all planned and expected releases of radiation into the air. I.43.23

I.43

I also comment on munitions loading onto vessels at the carrier docks. The record of decision for the Stennis EIS indicated that the Navy was seeking a waiver form its own reguations which would otherwisehave prohibited the loading of munitions this close to residences because of the danger of explosion. The new DEIS should explain the intention of loading munitions at the carrier docks, explain the risks that the Navy's regulations were designed to protect against and describe the explosion arcs that would result from a worst case accident and how this would impact nearby residents. I.43.24

I endorse all the comments of The Environmental Health Coalition on the DEIS by their letter dated November 12, 1998, including the expert reports enclosed therewith,and incorporate these comments and reports herein by reference. The comments and deficiencies discussed in therein should be fully addressed in the new DEIS. I.43.25

I also incorporate by reference the reports and comments of the consultants and experts and law firm hired by the City of Coronado and filed with the comment letter of the City of Coronado on the DEIS dated November 12. The comments and deficiencies raised by these letters and reports should be fully addressed in the new DEIS. I.43.26

While it is premature to consider whether and what mitigation might be make this project acceptable until all the impacts and risks are spelled out in a new DEIS as noted above, I note that the Stennis is already here as a result of a Environmental Impact Statement that was severely flawed in that it did not describe the impact of the entire project,nor adequately describe the risks and impacts of the project, and therefore the surrounding communities are alredy living with the radiation, toxic chemical and explosion risks that are also inadequately described in this DEIS. At the minimum, the NAvy should pay for the cost of a monitoring system, under the independent control of citizens, which is designed to monitor for radiation and toxic chemical releases. Moreover, the Navy must disclose, (and develop if it has not previously done so) emergency and evacuation plans which should be communicated to the public and rehearsed. I.43.27

Further, the Navy should make available potassium iodide from Federal stockpiles, to be stored in communities possibly affected by an accidental release of radiation in a hazadous amount, especially in the schools of such communities, with instructions on the circumstances in which administration of the potassium iodide would be advisable and the proper doses for different age groups. It may be necessary for the Navy to work through the State of California to do this inasmuch as the recent change in Federal regulations which makes Federal stockpiles of potassium iodide available contemplates a state request. I.43.28

Finally, The Navy should pay for a tunnel which would run from the San Diego Bay Bridge to inside the gates at North Island inasmuch as the tunnel would serve North Island exclusively and is made necessary by the enormous increase in traffic already coming into North Island as a result of the Navy's various expansion activities and which would be greatly worsened by the proposed project. I.43.29

Although I have commented on several possible mitigation measures that should be provided by the Navy based on the already existing conditions caused by the Stennis and other Navy expansion in San Diego Bay which were never properly addressed in an Environmental Impact Statement which covered the entire scope of the intended reconfiguration and expansion of the Navy presence in and around San Diego Bay, as well as the Additional nuclear aircraft carriers and related support facilities covered by the DEIS, I do not in any way intend to suggest that the homeporting of additional vessels and construction of related support facilities contemplated by the DEIS can be acceptably mitigated. While final thoughts on this matter must await the reanalyses, revision and republication of the DEIS as outlined above, based on what I now know about the scope of this project and the possible and expected impacts on Coronado and the San Diego region, I doubt that the risks and impacts can be adequately mitigated as to Coronado and the San Diego region. The actions proposed by the DEIS for Coronado and the San Diego I.43.30

region pose unacceptable risks and, therefore, must be withdrawn. I.43.30

Very truly yours,

Marilyn G. Field

Enclosures

I.43

Enclosures listed below were provided with this comment letter. These enclosures were also received from other commenting agencies or organizations, as indicated.

See attachments to comment O.13 by the Peace Resource Center of San Diego for the following :

- Draft letter from the Institute of Energy and Environmental Research

See expert comment letters attached to comment letter O.12 by Environmental Health Coalition for the following:

- Comments of Dr. David Richardson, Department of Epidemiology, School of Public Health, University of North Carolina, Chapel Hill, NC
- Letter by Camille Sears to Ms. Laura Hunter, Environmental Health Coalition, November 10, 1998.

See attachments to City of Coronado comment letter L.4 for the following:

- Memorandum from Lt E. N. Panlilio, MYSTIC AOIC to Reporting Senior RE: LT Mid-Term Counseling
- Questions from Marilyn G. Field, 1101 1st Street, to be raised by the Coronado City Council at April, 1996 meeting with Richard Guida and the city's independent nuclear consultant.
- Letter from Ivan A. Getting. Subject: Questions for meeting with Richard Guida. April 5, 1996
- Question for Mr. Richard Guida from Earle Callahan. April 5, 1996
- Letter from Environmental Health Coalition to Coronado Mayor and City Council. April 5, 1996.
- Questions for Mr. Guida from Stephanie Kaupp. April 5, 1996
- Questions for Mr. Guida, from Sandor Kaupp. April 5, 1996

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Marilyn G. Field

I.43.1 The Navy, as Lead Agency, has complied with all applicable regulations in the preparation of the Draft EIS; therefore, the Navy disagrees that the document is deficient in meeting NEPA requirements. Responses to public comments on the Draft EIS have been provided in this Final EIS. In response to some comments, additional information has been added to the text. The Navy considers that the Final EIS, incorporating revisions as a result of public comment, complies with NEPA requirements and no recirculation of the Draft EIS is required. Responses to your specific comments are provided below.

I.43.2 The closure of Naval Air Station (NAS) Alameda, California, and the relocation of two CVNs to fleet concentrations in San Diego and the Pacific Northwest were carried out in compliance with the 1993 Defense Base Realignment and Closure Commission (BRAC) recommendations. Consequently, the Department of the Navy constructed homeporting facilities for one CVN at NASNI (DON 1995a) and one at Puget Sound Naval Shipyard (PSNS), Bremerton, Washington (DON 1995b). New facilities were required at NASNI in order to support the homeporting of a CVN, since prior to 1998, there had been no CVNs homeported there. At the time the Navy proposed the construction of facilities at NASNI to support a homeported CVN, the Navy prepared an EIS to present the analysis of potential environmental effects associated with that action. A Final EIS for that project was completed in November 1995. The Navy knew at that time that, consistent with established policy, the two remaining CVs in the Pacific Fleet would eventually be replaced with CVNs. Further, the Navy knew at that time that homeporting those CVNs would require construction of additional facilities somewhere in the Pacific Fleet area of responsibility. Although a need had been identified, the Navy had not formulated an action to satisfy that need. Formulating an action to address that situation would require assessing the adequacy of existing facilities, determining the extent of new facility requirements, and identifying possible locations for home ports.

The environmental analysis in an EIS correlates to the level of planning for a particular project. If the planning has evolved such that the agency has formulated a project to meet a particular need, the EIS should reflect analysis of all aspects of that project, and the alternative methods of meeting the identified need should be addressed on a "co-equal" basis. In this case, the Navy had not, at the time of preparation of the 1995 EIS, formulated a proposal for how to meet the need of facilities for two more CVNs in the Pacific Fleet.

However, the Navy did anticipate that in the future, a proposal would be formulated, and that the alternatives could include facilities at NASNI. Therefore, a larger project was not segmented into two smaller projects for the purpose of avoiding more rigorous environmental analysis. Further, although a

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"proposal" had not been formulated such that it could be analyzed on a "co-equal" basis in the 1995 EIS, it was reasonably foreseeable that a future project could include additional facilities at NASNI. Since it was reasonably foreseeable, the potential effects were included in the analysis of cumulative effects in that document. The 1995 EIS states "This EIS, therefore, considers the potential cumulative impacts of CV replacement and homeporting a total of three CVNs in San Diego." See Volume 1, Chapter 6, DON 1995a.

The U.S. District Court for the Southern District of California approved the Navy's implementation of NEPA, and concluded that the Navy had not understated the potential effects of a larger project by preparation of two documents (segmentation). In an Order dated May 12, 1997, the Court stated , "Because the Court finds that no proposal to homeport three CVNs existed prior to the issuance of the Final EIS, the Final EIS's analysis of the possible cumulative impacts of potential additional home ports suffices under NEPA."

The Navy, as Lead Agency, complied with all applicable regulations in the preparation of the Draft EIS; therefore, the Navy disagrees that the document is deficient in meeting NEPA requirements. The comment states that CEQA is the state equivalent to NEPA. In fact, there are several substantial differences between the two statutes. However, in the comment it is correctly stated that both statutes do have disclosure requirements. The Navy believes that the EIS satisfies both the spirit of and the specific requirements of NEPA and its implementing regulations in terms of analyzing and disclosing the environmental effects of the proposed action and alternatives. Please note that federal agencies are not subject to CEQA. Under recent amendments to CEQA, state agency actions of issuing permits to federal agencies are now subject to CEQA.

I.43.3 Please see the response to comment I.43.2 above.

I.43.4 The technical analyses contained in the appendices are to support conclusions contained in the EIS, consistent with 40 CFR 1502.18. Please see responses to comments L.4.34 and O.10.34.

I.43.5 Tables F-9 and F-11 have been revised to be consistent with Table F-7. Specifically, risk is stated in scientific notation (e.g., 5.0×10^{-7}) and statistical terms (e.g., 1 in 2 million). Converting between the two can be done by simply taking the inverse of the number or $1/2{,}000{,}000 = 5.0 \times 10^{-7}$.

I.43.6 Please see response to comment O.12.25.

I.43.7 Please see response to comment O.12.27.

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I.43.8 Health effects other than cancer are discussed in Appendix E, as well as in response O.12.27.

I.43.9 Please see response to comment O.12.190.

I.43.10 Please see response to comment O.12.84 and O.13.27.

I.43.11 Appendix F, section 2.4, states that the 95 percent meteorological condition is the combination of weather stability class and wind speed that results in the highest calculated exposures. This means that at least 95 percent of the time, weather conditions are such that doses equal to or less than those calculated would result (combinations of faster wind speeds and/or more unstable atmospheric conditions). For the EIS accident analyses, Pasquill Stability Category F with a wind speed of 0.89 meters per second is used.

Since the locations of members of the public are different for each of the 16 compass directions evaluated, doses are calculated for each of the 16 possible wind directions, each using the 95 percent meteorological condition. The analysis results reported in Table F-9 for the nearest public access individual, maximally-exposed off-site individual, and the public are the largest of the 16 exposures calculated, and represent conservative estimates of doses to receptors in any of the 16 compass directions. For this reason, and to minimize the complexity of the EIS, exposures and distances for all 16 directions are not reported.

I.43.12 Please see responses to comments L.4.47, L.4.48, and O.12.53.

I.43.13 Risks to members of the public from normal operations and accident scenarios are presented in two distinct ways: risk to a member of the general population within 50 miles in which dose to the entire population is averaged over the entire population, and risk to the maximally-exposed off-site individual in which the dose is directly received and not averaged. Risk to the maximally-exposed off-site individual is calculated by analyzing the dose to a specific member of the public, which results in a higher hypothetical risk to the maximally-exposed off-site individual which bounds the risk to a member of the general population. Thus, no change to the EIS is deemed necessary.

In addition, contrary to the commentor's assertion, exposure to the Mexican population is calculated and reported separately in Appendix F, section 3.

I.43.14 As is explained in section 2.1 of Appendix F, the maximally-exposed offsite individual is defined as a theoretical individual living at the base boundary receiving the maximum exposure. Since that individual receives the maximum exposure, the exposure for the maximally-exposed off-site individual bounds the exposure for any member of the public in any of the 16 compass directions. The

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same methodology is used to determine the exposures to the nearest public access individual. For this reason, and to minimize the complexity of the EIS, individual distances for the maximally-exposed off-site individual and nearest public access individual are not needed to be reported in the EIS. For information, the nearest public access individual is located 945 meters from the release point, and the maximally-exposed off-site individual is located 1,189 meters from the release point at North Island. Differences between the dose estimates to the nearest public access individual and maximally-exposed off-site individual are due to different modeling assumptions used for those individuals. Table F-5 of Appendix F identifies the different exposure times used in the analysis. Since calculations are based on assumptions appropriate to the individual being evaluated, assuming that a Coronado resident would receive the same exposure as non-involved worker at NASNI is not a technically correct assumption.

I.43.15 The comments provided in the letter attached by the commentor were developed for a meeting which was outside the scope of the present NEPA process, and were not generated as a result of direct review of the subject Environmental Impact Statement. However, since some of the comments address issues relating to those in the EIS, the Navy has the following responses:

1. Routine and accidental releases of radioactivity are addressed in responses O.12.33 and L.4.37.

2. Please see response to comment O.10.38.

3. Please see response to comment O.12.49.

4. Please see responses to comments L.4.39 and L.4.40.

5. Tables F-9 and F-11 of Appendix F provide the consequences of hypothetical releases of radioactivity to both on-site personnel and members of the public.

6. Please see response to comment O.12.49.

7. As described in section 7.1.4 of the EIS, features such as redundant systems enhance reactor safety as well as contribute to the ability of the ship to survive combat.

8. Please see response to comment O.12.33.

9. Please see response to comment O.12.33.

10. Please see response to comment O.12.33.

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11. The Navy has analyzed radiological risks from the proposed action, and has determined those risks to be not significant. The risk associated with more probable but less severe accidents are bounded by the accident analyses contained in the EIS. As discussed in the EIS, examining the kinds of events which could result in release of radioactive material to the environment or an increase in radiation levels shows that they can only occur if the event produces severe conditions. Some types of events, such as procedure violations, spills of small volumes of water containing radioactive particles, or most other types of common human error, may occur more frequently than the more severe accidents analyzed. However, they involve minute amounts of radioactive material and thus are insignificant relative to the accidents evaluated. Stated another way, the very low consequences associated with these events produce smaller risks than those for the accidents analyzed, even when combined with a higher probability of occurrence. Consequently, they have not been evaluated in greater detail in this Environmental Impact Statement.

12. Please see response to comment O.12.33.

13. The Navy's radiological environmental monitoring program focuses on nuclear-powered ship transit routes and areas near where nuclear-powered ships are berthed. The radioactive slag described by the commentor appears to have been used for beach erosion control in an area removed from such locations, and thus the NNPP's program did not detect any unusual radioactivity concentrations resulting from the slag. In addition, the type of elevated radioactivity in the slag, radium, was not related to NNPP operations. However, it is important to note that the Navy, pursuant to the CERCLA process and in coordination with CA-DTSC, is actively remediating those areas where radioactive slag was present. All radioactive slag has since been removed from locations below the high water mark, and remediation of the remaining slag is currently being pursued.

14. Issues regarding the schedules for radioactive waste disposal facilities are beyond the scope of this EIS.

15. Please see response to comment O.10.28.

16. As described in response O.12.69, issues associated with constructing and operating the NASNI Depot Maintenance Facility, including the Mixed Waste Storage Facility and Controlled Industrial Facility, were analyzed in reference DON 1995, and are beyond the scope of this EIS. However, it is important to note mixed waste will be shipped to off-site treatment and disposal facilities in accordance with a Mixed Waste Treatment Plan,

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which outlines the Navy's planned treatment and disposal paths for each NASNI mixed waste stream stored in the MWSF. The Mixed Waste Treatment Plan is a means to ensure the Navy continues it present practice of aggressively pursing treatment and disposal paths for its mixed waste. In addition, low-level radioactive waste is shipped to off-site disposal facilities as soon as practicable, with consideration given to minimizing the number of truck shipments. The Navy does not dispose of it low-level radioactive waste at its facilities. Rather, low-level radioactive waste is disposed of at licensed Department of Energy or commercial disposal facilities.

17. As described in response O.12.84, section 7.4.3.4 of the EIS states that shipments of radioactive materials in the NNPP are made in accordance with applicable regulations of the U.S. Department of Transportation, U.S. Department of Energy, and the U.S. Nuclear Regulatory Commission. In addition, the Navy has issued instructions to further control these shipments. These regulations and instructions ensure that shipments of radioactive materials are adequately controlled to protect the environment and the health and safety of the general public, regardless of the transportation route taken, and have proven to be effective. Shipments of radioactive materials associated with Naval nuclear propulsion plants have not resulted in any measurable release of radioactivity to the environment. Please also see response to comment O.12.132.

18. Section 7.4.1 of the EIS describes the half-lives of radioactivity expected for low-level radioactive waste in the facility. Please also see response to comment O.12.132.

19. As described in response O.12.84, section 7.4.3.4 of the EIS states that shipments of radioactive materials in the NNPP are made in accordance with applicable regulations of the U.S. Department of Transportation, U.S. Department of Energy, and the U.S. Nuclear Regulatory Commission. As such, the Navy's definition of low-level radioactive material is consistent with those regulations.

20. Releases of radioactivity are addressed in the EIS, most notably in sections 7.4.2.2 and 7.6. Please also see response to comment O.12.182.

21. Issues associated with standards associated with siting of other nuclear facilities are beyond the scope of this EIS.

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22. Issues associated with constructing and operating the NASNI Depot Maintenance Facility were analyzed in reference DON 1995, and are beyond the scope of this EIS.

23. Please see response to comment O.10.31.

24. Appendix I of the EIS contains a detailed description of the activities conducted in the Controlled Industrial Facility.

25. See section 7.4.3.2 of the EIS contains a discussion of low-level radioactive solid waste generated as a result of Naval ship and maintenance facility operations, which is the same types of material cited by the commentor.

I.43.16 Appendix I already states, "Refueling/defueling of nuclear reactors on NIMITZ-class aircraft carriers can only be done at a qualified shipyard during a defueling/refueling availability. No refueling/defueling availabilities are planned for any of the alternative sites qualified to perform defueling/refueling although PSNS has the facilities to be able to accomplish this work." Thus, no change to the EIS is deemed necessary. In addition, please see response to comment O.12.86.

I.43.17 Please see responses to comments O.12.174-178 and O.12.191-197.

I.43.18 As discussed in Appendix I, "Tanks would be located adjacent to the ship to receive various fluids discharged for processing (e.g., radioactive liquid drained from the nuclear propulsion plant, . . . "

The following will be added to clarify the radioactive liquid collection tanks in Appendix I:

"Radioactive liquid collection tanks are constructed with heavy gauge corrosion resistant steel, and are very robust. These tanks are connected to the ship by temporary hoses that are tested and certified before use, and are radiologically controlled and operated by the strict control procedures discussed in Chapter 7 of this EIS. The tanks are then transferred to the Controlled Industrial Facility for processing."

The probability of a tank rupture is assessed in Appendix F, section 3.2.2. This probability accounts for potential industrial accidents such as vehicular accidents, lifting and handling accidents, or others. The NNPP has never had a radioactive liquid collection tank rupture in the history of the Program.

I.43.19 Radiological control practices of the NNPP are discussed in section 7.4.3 of the EIS. Probability of accidents are discussed in Appendix F, section 3.2.1 and 3.2.2.

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I.43.20	Shipment of radiological and/or hazardous substances associated with the proposed action at NASNI are discussed in section 3.15 of the EIS. Shipment of radiological and/or hazardous substances from activities not associated with the proposed action are beyond the scope of this EIS.
I.43.21	Please refer to the EIS, Volume 1, paragraph 2.3.2.1, which states that no dry-dock facilities exist at NASNI and none are planned.
I.43.22	The normal emissions of NNPP activities is summarized in Appendix F, section 3.1. The risk associated with these releases is calculated in Appendix F, Tables F-6 and F-7.
I.43.23	Please see responses to comments O.12.33 and O.12.81.
I.43.24	Please refer to response O.12.90 for a discussion on handling high explosives at both the BRAC CVN berth (Berth Kilo) and the Preferred Alternative-required berth (Berth Juliet). In summary, the Navy does not intend to load or off-load high explosives at these locations.
I.43.25	Please see the responses to comment letter O.12 by the Environmental Health Coalition. All comments on the Draft EIS have been responded to.
I.43.26	Please see the responses to comment letter L.4 by the City of Coronado. All comments on the Draft EIS have been responded to.
I.43.27	Actions associated with the Navy's 1995 Final Environmental Impact Statement for the Development of Facilities in San Diego/Coronado to Support the Homeporting of One NIMITZ Class Aircraft Carrier are complete (except for the MWSF at the time this response was written). The 1995 EIS was challenged in the Federal Court System, and was upheld as being adequate on all issues challenged. Please see responses to comments to L.4.36, O.12.53, and O.10.31.
I.43.28	Please see responses to comments O.12.78.
I.43.29	The traffic analysis presented in the Draft EIS indicated that the proposed action would not have a significant traffic impact because, for the maximum development scenario, it would simply be providing additional capacity to homeport two nuclear carriers (CVNs) as a replacement for two CVs. As the larger CVNs would have more personnel than the CVs, there would be a proportional traffic increase of approximately 27 vehicle trips during the peak hours and 150 trips per day. This level of additional traffic would not have a significant impact and would definitely not justify the construction of a tunnel between the Bay Bridge and the NASNI Main Gate. This tunnel project is being

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	studied by public agencies as a measure to reduce the effects of existing Navy-related traffic on the Coronado residential streets.
I.43.30	Regarding your comments on segmentation or piece-mealing, see response to your comment I.43.3 above. Your opinions are noted and are included in the Final EIS.

MARILYN G.FIELD
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November 12,1998

Mr. John Coon (Code 05AL.JC)
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132

RE: Comments on the DEIS for Developing Home Port Facilities for Three Nimitz-Class Nuclear Powered Aircraft Carriers in Support of the U.S. Pacific Fleet

Dear Mr. Coon:

I sent a comment letter on the above captioned subject earlier today but I have two additional comments:

1) The Navy should provide a baseline study of whether residents of the communities surrounding San Diego Bay already are experiencing elevated rates of cancer and other adverse health consequences compared to national averages. Residents of these communities may already be experiencing adverse health consequences as a result of past and ongoing Navy activities, including the nuclear submarine fleet and the maintenance thereof in Point Loma. If elevated rates of cancer and other adverse health consequences were found it may or may not be possible to determine whether the cause is attributable to Navy activities but would it would certainly suggest that no further activities be undertaken by the Navy which could increase health hazards to residents of the communities surrounding San Diego Bay. This analysis should be provided in the new Draft Environmental Impact Statement ("DEIS") as suggested in my earlier letter of even date. I.44.1

2) The noise analysis in the new DEIS should include an analysis of the noise caused by the helicopter traffic along the Bay which can be extreme and disruptive (conversation and telephone conversation must cease until the helicopters - which often seem to travel in fleets - pass over). There has definitely been an increase in helicopter traffic along the Bay in the past several years. I.44.2

Very truly yours,

Marilyn G. Field

Comment Number	Response

Marilyn G. Field

I.44.1 Epidemiological studies concerning areas near NNPP facilities are summarized in Appendix E. The Navy believes these studies provide sufficient baseline to assess the impacts of NNPP activities in any of the homeport sites considered.

I.44.2 As stated in sections 3.11.2.2, 3.11.2.3, and 3.11.2.4 of the Draft EIS, "CVN homeporting would not result in any increase in the aviation units based at NASNI or any increase in air traffic at NASNI. Therefore, no increased aircraft noise would result." This statement applies to helicopters as well as fixed-wing aircraft. For additional information on aircraft and air traffic at NASNI, please refer to section 2.3.2.1.

FAX 532-4998 11-12-98

To: John Coon, Project manager
Southwest Division Naval Facilities
Engineering Command. Code 05AL-JC
1220 Pacific Highway San Diego. 92132

greetings - this last comment day —
a copy of my letter of complaint
follows. Of course, people could
move away from San Diego if
the carriers move in — but let's
face it — we are a nuclear-occupied
country & fate is tempted minute
by minute - (See map)

I.45.1

Sincerely & especially yours
Leone Hayes
Tel/FAX 459-6462
5416 Candlelight Dr
La Jolla 92037

There may be some eco
Diego by clustering thes
there is a valid preceder
this always-possibly dangerou

Some years ago, the Shoreh
Island. No permits or license to
residents - led by then-Gover
that the Island could not be ev

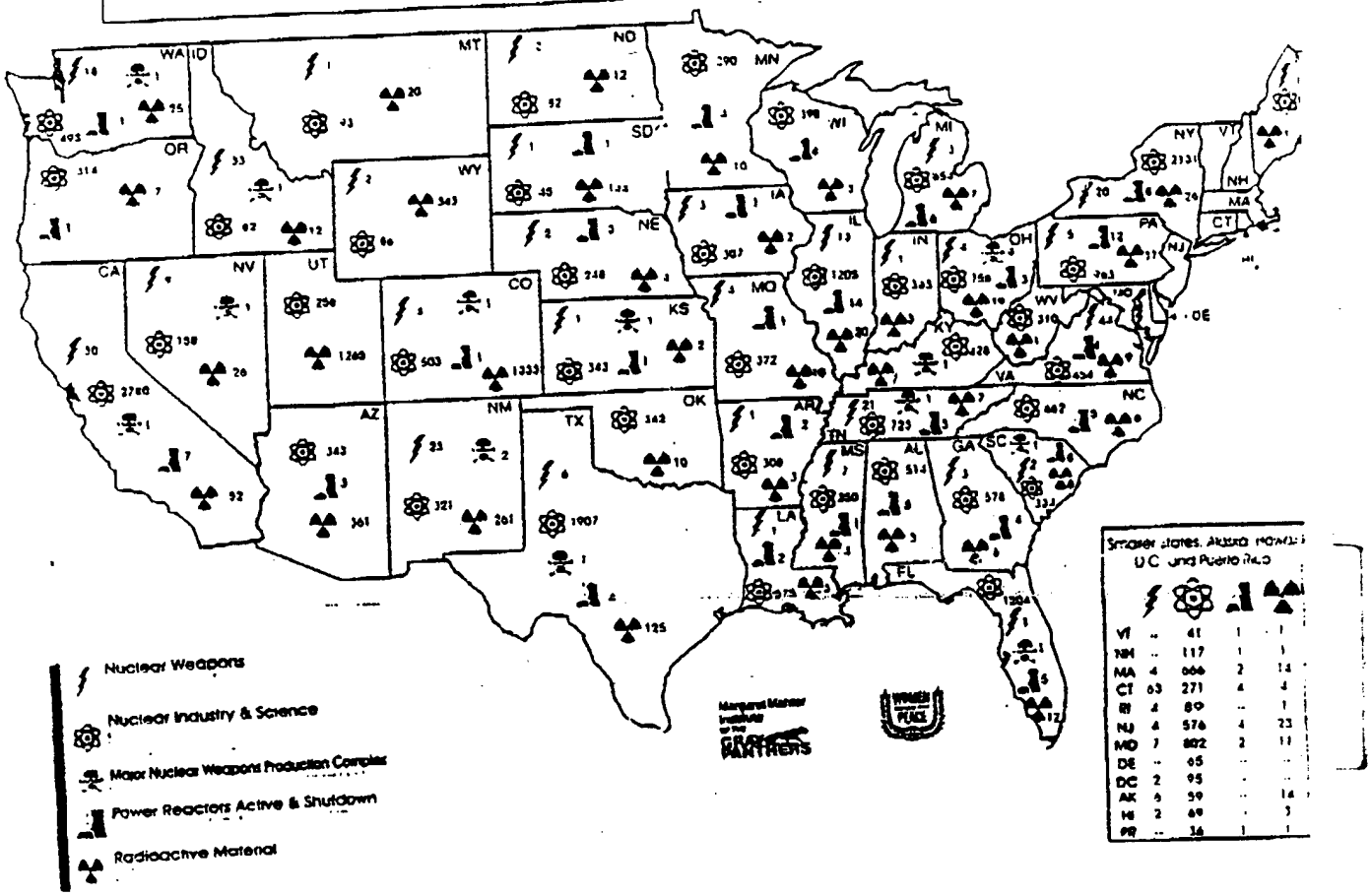
What applied to Long Islan
As for San Diego, it is not an
segment of Southern Californi
city boosters are busy planning
the harbor with the expanded
complex - face to face with the
power performance. Three can
radioactive waste, the storage

Filner's article poses seve
nuclear Navy seek to mis
its nuclear accident and
Filner having such a difficult
Navy? And why is the Navy in
questions?

The answer can be found
autonomous Office of Naval N
a four-star admiral who is als
(the only dual military-civilian
ment). According to Robert H
this office's control over all i
issues has prevented a detailed
of the Navy's nuclear reacto
taken.

Because it operates outside
and also possesses separate
Energy, its director has vast u
scrutiny by layers of classifica
the Naval Nuclear Propulsion

DEADLY NUCLEAR RADIATION HAZARDS USA



The recently released ***DEADLY RADIATION HAZARDS USA*** report and new nuclear map, researched and designed by Louise Franklin-Ramirez and John Steinbach, demonstrates the horrific consequences of America's nuclear nightmare. One look at the map of nuclear America provides a chilling view of our country's future—which will be forever clouded with the legacy of 50 years of nuclear proliferation by the nuclear industry ***for the next 200 millenia.***

The map and report serve as a blueprint for activists, students, and citizens who are concerned about nuclear issues. The map provides visual, concrete proof of the nuclear toxicity of our country. It is no longer possible for the nuclear industry and their cohorts in the government to claim that nuclear atoms are "friendly" as they try to sweep their lethal deadly garbage under the rug—***or into unlined trenches as proposed for the pristine Ward Valley site near Needles, California.*** The industry's dirty little secret is out, and they must be held financially and morally accountable for the mountains of nuclear waste strewn across America.

TO ORDER:

To Order: MAP AND DATA BASE: $20; MAP ALONE: $7; DATA BASE ON COMPUTER DISC-MAC OR PC: $15.

SEND CHECK/MONEY ORDER TO: VISUAL INFORMATION PROJECT, 7615 LAKE DR, MANASSAS, VA, 22111

...s: Dale Harbor or Pearl Harbor?

This letter by Leone Hayes was printed in The San Diego Union-Tribune *on August 29 under the title "What applied to Long Island should apply to San Diego."*

some economic benefit to the Navy and San
istering these carriers in our front waterway, but
lid precedent upon which to base efforts to stop
y dangerous project, namely:
the Shoreham nuclear reactor was built on Long
or license to operate was ever granted because the
then-Governor Mario Cuomo - convinced NRC
d not be evacuated in case of disaster.
Long Island should certainly apply to Coronado.
it is not an island, but it is a highly populated
n California coastal topographical trap. And the
isy planning greater concentrations of visitors at
expanded convention center and baseball park
ace with the equivalent of San Onofre in nuclear
. Three carriers means 6 reactors also generating
the storage facility for which is either over or close to the earthquake fault that runs through North Island, depending upon which Navy map is correct.

North Island is a good part made land - not very stable and of concern, because the rad waste facility would be close to an elementary school - in case of a quake, etc. There has never been a live evacuation drill in San Diego, because "people might panic." In Japan neighborhood drills are conducted. From news reports, it seems that Secretary of Defense, William S. Cohen, has the final say on homeporting. He needs our urgent requests to base the carriers in different ports, rather than concentrating them - a la Pearl Harbor - in San Diego. •••

Contact Secretary Cohen at
The Pentagon, Washington, D. C. 20301-1155

THE SAN DIEGO REVIEW, SEPTEMBER 1998

I.45

This letter by Richard Dittbenner, Professor of LA, Southwestern College, was printed in The San Diego Union-Tribune *on September 5 under the title "The Navy, the congressman and nuclear safety."*

poses several implicit questions: Why does the
seek to misstate and conceal the truth regarding
ccident and radiation release record? Why is
a difficult time getting information from the
the Navy investigating ordinary citizens who ask

n be found in the attitude and values of the
of Naval Nuclear Propulsion, which is headed by
who is also a deputy undersecretary of energy
tary-civilian arrangement of this type in govern-
o Robert Holzer, a reporter for Defence News,
l over all information relating to naval nuclear
d a detailed assessment of the health and safety
lear reactor program from ever being under-

ttes outside the channels of command in the Navy
separate authority in the U.S. Department of
has vast unregulated authority. Shielded from
of classification and little independent oversight,
Propulsion Office has asserted its power into virtually every area of submarine and aircraft carrier development and operation.

On a recent visit to San Diego, Richard Guida, associate director for regulatory affairs for the Nuclear Propulsion Office, said that the nuclear Navy would not disclose to civilians in nearby communities the amounts of radiation leaked from the submarine base at Point Loma or the radioactive storage site proposed for North Island. Why not? According to Guida, because "groups like Greenpeace would try to shut us down."

It follows that if the leadership of the nuclear Navy fears disclosure of safety information to community-based groups, safety questions posed by concerned citizens or members of Congress will fare no better.

This may lead to erosion of public support for the nuclear Navy's presence in San Diego.

Contact Secretary Cohen at
The Pentagon, Washington, D. C. 20301-1155

Comment Number	Response

Leone Hayes

I.45.1 Please see response to comment I.4.1.

OCT 23RD - 1 9 9 8

TOM B. ARENA
P O BX # 70106
SAN DIEGO - CA
9 2 1 6 7

DEAR SIRS,
HONORED MEMBERS OF THE BOARD:

I WANT TO THANK YOU FOR THE OPPERTUNITY TO ADDRESS THIS BOARD AND CONTRIBUTE COMMENTS WHICH I FEEL I MUST, IN AS MUCH AS SAN DIEGO IS MY HOME ALSO, AND I WANT TO FEEL JUST AS SAFE LIVING HERE, AS DO OTHER CITIZENS LIVING HERE. IF I DID NOT FEEL SAFE WITH NUCLEAR SHIPS BASED CLOSE TO ME, COMMON SENSE DICTATES THAT I SHOULD AND MUST, MOVE TO A SAFER LOCATION.
HOWEVER, MY SAFETY, SHOULD NOT, AND MUST NOT, IMPAIR THE ABILITY OF MY COUNTRY, MY NAVY, FROM DOING IT"S MAIN JOB, PROTECTING AND DEFENDING OUR COUNTRY AND THE FREE WORLD. ALL OF US MUST BE WILLING AND READY TO SHARE THE COST AND BURDEN FOR THE PEACE AND FREEDOM WE HAVE ENJOYED FOR OVER 100 PLUS YEARS. OUR NAVY HAS PLAYED A MAJOR ROLE IN GIVING US THIS PEACE AND FREEDOM.

I.46.1

I.46

IN REGARDS TO THE BERTHING OF THE NUCLEAR CARRIERS AT N A S N I, AND TO THOSE WHO HAVE BEEN PROTESTING THE MOST AND LOUDEST, I AM REMINDED OF CHICKEN LITTLE WHO CRIED, " THE SKY IS FALLING - THE SKY IS FALLING ".
THERE ISN"T A NAVY OR COUNTRY IN THIS WORLD THAT HAS A BETTER SAFETY RECORD, OR BETTER TRAINED MEN AND WOMEN THEN OUR OWN MEN AND WOMEN SERVING ON THESE HIGH TECH FLEET OF SHIPS. THE STANDARDS AND TRAINING ARE THE MOST RIGID IMAGINABLE.

HAVING SERVED IN THE MARINES, AND HAVING BEEN A TEACHER, SR.HIGH & JR.COLLEGE, I FEEL AMPLY QUALIFIED TO MAKE THESE COMMENTS. FOR THE PAST 2 WEEKS, I HAVE BEEN SPENDING MY FREE TIME, READING THIS ENTIRE REPORT, AND WHILE I AM NOT A NUCLEAR ENGINEER, UNDERSTANDING THIS COMPREHENSIVE REPORT, DOESN"T TAKE AN OXFORD RHODES SCHOLAR TO UNDERSTAND IT.

I.46.1

THE MEN AND WOMEN SERVING ON THESE SHIPS ARE NOT YOUNG KIDS FRESH OUT OF HIGH SCHOOL. THEY ARE MEN AND WOMEN WHO HAVE MANY YEARS IN THE NAVY, PEOPLE WHO HAVE BEEN GIVEN TRAINING AND EDUCATION MOST COLLEGE GRADUATES WOULD ENVY. WE ARE NOT ABOUT TO PUT ON ANY NUCLEAR SHIP, ANY PERSON WHO HAS NOT BEEN TRAINED, EDUCATED, AND, MADE AWARE OF THE RESPONSABILITY AND DANGER OF SERVING ABOARD SUCH A CRAFT.

IN REGARDS TO THE SAFETY RECORD OF THESE NUCLEAR SHIPS, I WANT TO REMIND EVERYONE THAT WE HAVE BEEN OPERATING A FLEET OF NUCLEAR SUBMARINES FOR MANY YEARS WITH A SAFETY RECORD THAT WOULD IMPRESS EVEN EINSTEIN HIMSELF.
OUR NAVY"S SAFETY RECORD SPEAK FOR ITSELF AND I CHALLENGE ANYONE TO PROVE OTHERWISE. JUST UP THE COAST, WE HAVE A NUCLEAR POWER GENERATING FACILITY AND SITTING ON A FAULT, AND AS YET, THROUGH ALL THE MANY YEARS OF OPERATING, WE HAVE NEVER EVER HAD SO MUCH AS A WARNING OF ACCIDENTS.
OUR NUCLEAR FLEET HAS JUST AS IMPRESSIVE A RECORD AND BETTER.

IN CONCLUSION, I WANT TO SAY THIS, THAT, IF WE THE PEOPLE FEEL ANYTHING FOR THE MEN AND WOMEN WHO, DAILY PUT THEMSELVES ON THE LINE TO HELP MAKE OUR COUNTRY AND WORLD A BETTER SAFER PLACE TO LIVE, THEN I FEEL AND BELIEVE WE OWE THOSE BRAVE YOUNG MEN, WHO NOW LAY ENTOMBED AT THE BOTTOM OF THE OCEAN IN THE HULL OF THE U S S.ARIZONA, THE RIGHT TO CARRY ON THE HIGHEST AND FINEST TRADITIONS OUR NAVY REPRESENTS. I.46.1

WE OWE THE MEN AND WOMEN SERVING OUR NATION TODAY, THE VERY BEST TRAINING AND EQUIPMENT AVAILABLE SO AS TO MAKE DOING THEIR JOB, SERVING OUR COUNTRY, THE VERY BEST WE EXPECT FROM THEM AND OUR NAVY. SAN DIEGO FOR 150 YEARS HAS BEEN, NAVY TOWN U S A, I PRAY TO GOD IT WILL ALWAYS BE SO.

THANK YOU FOR ALLOWING ME THE OPPERTUNITY TO SHARE WITH YOU AND MY FELLOW CITIZENS MY OWN FEELINGS ON THIS MATTER.

Tom B. Arena

Comment Number	Response

Tom B. Arena

I.46.1 Your comments are noted and are included in the Final EIS.

4762 Jessie Avenue No. 5
La Mesa, CA. 91941
(619) 667-0339
November 5, 1998

Mr. John Coon, Project Manager
Southwest Division, Naval Facilities, Engineering Command
Code 05SAL-JC
1220 Pacific Highway
San Diego, CA 92132

Cordial Manager John Coon ,

Recent history has brought to light many discussions on every issue that could come into thought on the nuclear dilemma here in San Diego. It is time to act on this matter! The institution you work for need not abandon the people in this dire time. Rather, the immediate action that you lend could prevent a significant nuclear disaster. Public protection is the responsibility of the government; therefore, this entity should be on the side of the people that it was design to protect. I.47.1

I.47 Appalled at the thought of having a nuclear port facility (i.e., nuclear subs & ships) in San Diego Harbor, I request your support. Empirical research conducted by educated fellow San Diego's residents and other leading world scientist have aided my conclusion, hazardous ramifications exist for the environment and the people's safety is at stake. Life as we understand it could cease. Because of the scientific evidence that currently supports community suspicion, the people of San Diego and I demand no less than a halt in nuclear porting. Public safety, environment, and cost are our basis for requesting your attention. The Navy should begin appeasing the public concern by implementing tactics to begin removal of all nuclear powered vessels home-ported here. Public concerns can not be denied or refuted.

We will not allow the navy to ignore the evidence compiled by many great minds. Every issue we believe to be important is not been properly addressed or resolved. Simply put, the Navy's political posturing leads the community and I to demand no less than an active role in the decision making processes that effect our safety. The safety of our people is in serious jeopardy, because San Diego is unprepared for any eventual mishap. I.47.2
In a nuclear emergency, the area down wind to be evacuated is 12 miles; yet, no parameter warnings, no public warning sirens, no evacuation plans exist to protect San Diego inhabitants. If there is a Naval reactor accident, implementation of proper treatment to radiation exposures is impossible because there are no supplies of potassium iodide available for the population to protect themselves. Past mishaps are bad enough and additional ships will only add irreversible damage and imbalances to our environment. In addition, contrary to what the Navy told us, medical literature shows even smaller amounts of radiation, than previously believed can be "medically devastating" said the president of the Peace Resource Center (10/27/98). Any physical threat is intolerable and calls for action, removal of this threat from our bay and away from our coastal cities is the only acceptable course of action. I.47.2

Environmental test presented by the navy remain inconclusive because these tests are full of fallacies. Radioactive waste and radiation exposure do affect our ocean, our land, our animals and our air. Already, the dredging of our bay that began in September is posing a threat to downwind neighboring schools. I worry for the welfare of those children as well as the rest of the people in our community. Furthermore, the fish and wild life in our bay are already experiencing current damaging affects. Contaminants such as mercury and lead are on the floor of our bay. These toxic metals, and other contaminants are destroying basic marine life. The current levels of deterioration remove valuable resources from our coastal waters. There are 38 Navy bases authorized to transport hazardous waste through our streets. This increases the opportunities for a catastrophe. An accident in our streets is improbable, but not impossible; therefore, I am not willing to continue to take risk against my life. It is time that you begin protecting us from imminent risks, rather than protecting us from possible enemy threat. Besides the adverse effects our health and the environment suffer and the potential danger of mishap, this project is a money pit. I.47.3

When calculated, the long term cost to the tax payer could mount to tens of billions of dollars. According to the Peace Resource Center, the cost of the construction and decommission of a nuclear powered aircraft carrier in 1995 averaged to 5 billion dollars. Moreover, the estimated cost of operating each nuclear powered aircraft carrier is 1 million dollars a day. The Navy plans to build two additional ships; I believe this is a waste of taxpayers' money. More ships bring additional troops, and this will further tax the over extended environment, that means cleanup-cost. The additional personnel to man and maintain ships will serve to complicate the lesser issues that also surround the ships planned port project. Issues that effect San Diego community are far reaching and range from such problems as increased traffic congestion, short falls in housing, even crime will increase. San Diego's residents and I do not want the nuclear ships and the facilities needed to maintain a deadly nuclear megaport. I.47.4

Mounting bad evidence, of no concrete safety solutions, coupled with the Navy's unwillingness to involve the public in their decision making process is enough to fuel my disdain. I have read and heard more than I need to on the matter. Writing many people to voice my concern on these matters, is the only recourse I know, yet I remain unsatisfied. Safety of our city is in jeopardy, environment is being destroyed, and the cost is intolerable. I appeal to your humanitarianism, and I hope that you will act on this matter by standing up for the people of San Diego. I thank you for your prompt attention and await your response. I.47.5

Sincerely
Luigi Angilello

Comment Number	Response

Luigi Angilello

I.47.1 Our publicly-elected U.S. Congress and President of the United States make programmatic decisions regarding Naval ships (e.g., application of nuclear power), and thus comments regarding these decisions are beyond the scope of this EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

I.47.2 Please see responses to comments L.4.36, O.10.31, O.12.78, and O.12.190.

I.47.3 The EIS addresses the potential environmental impacts to present conditions associated with homeporting three CVNs. The impact analysis for San Diego Bay indicated that homeporting is not expected to result in significant adverse impacts to water or sediment quality. Risks associated with operations of NNPP facilities are summarized in section 7.6 of the EIS. The results of these analyses indicate there is no significant radiological risks from NNPP operations.

I.47.4 Please see response to comment I.47.1.

I.47.5 Your comments are noted and are included in the Final EIS.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Josette Marie Charmasson

Address: 623 Genter St., La Jolla CA 92037

COMMENTS:

I attended the Oct. 28th meeting in San Diego & was appalled by the Navy representatives' attitudes towards the civilians of San Diego County. I.48.1

How dare they have a meeting "after the fact", now that a nuclear vessel is already in the Harbor & now that they have already decided of the location of the 2 other ships

Who is their right mind would allow a nuclear "anything" in their "backyard"? I.48.2

I am so shocked that I cannot even write properly - After 22 years of residency I thought I had a saying in this matter - I.48.3

Josette M. Charmasson
Signature

11/9/98
Date

Note: This form is supplied for your convenience. You are not required to use this form. Comments of any length may be submitted to the address on the reverse side of this form. Your comments should be postmarked on or before November 12, 1998.

Comment Number	Response

Josette Marie Charmasson

I.48.1 A previous EIS was prepared in 1995, the "Final EIS for the Development of Facilities in San Diego/Coronado to Support the Homeporting of One NIMITZ-Class Aircraft Carrier," and public hearings were held in Coronado for that project on August 17, 1993 and June 7, 1995. No decision regarding adding more CVNs to San Diego/Coronado has been made. This decision will be made no sooner than 30 days after the Final EIS is published.

I.48.2 Please see response to comment I.4.1.

I.48.3 You do have input into the process. The National Environmental Policy Act of 1969 requires public participation to solicit concerns, issues, and opinions before a decision on a federal action that may have significant environmental effects are made. You have made comments on the Draft EIS and they are addressed in the Final EIS. The decision maker reviews the Final EIS including all comments and responses before making a decision whether or not to proceed with the proposed action or any of its alternatives.

November 10, 1998

Mr. John Coon (Code 05AL.JC)
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132

Dear Mr. Coon:

I have read with interest the Draft Environmental Impact Statement (DEIS) Developing Homeport Facilities for Three Nimitz-Class Aircraft Carriers. The DEIS is long on rhetoric and short on facts. The finding that two additional Nimitz-Class Aircraft Carriers at Naval Air Station North Island (NASNI) will have no impact on the environmental quality of life in Coronado is incredible. It is even more incredible that there is a finding that two additional Nimitz-Class Aircraft Carriers at NASNI will only add fifty five additional automobiles to the daily traffic in Coronado. I.49.1

Was the DEIS prepared by the same government scientists that assured us that Agent Orange was a harmless defoliant? I.49.2

Perhaps the government scientists who proclaimed that participants in the Gulf War who complained of illness (Gulf War Syndrome) were maligners also collaborated in the preparation of the DEIS.

I wonder why government requires the owners of commercial nuclear reactors to provide: I.49.3

1. Perimeter radiation leak detection systems;

2. Warning systems for surrounding residents, and

3. Evacuation plans for effected residents.

Did I overlook this discussion in the DEIS?

Sincerely,

Robert E. HAFEY
273 Alameda Blvd.
Coronado, CA 92118-1133

cc: Mayor Thomas J. Smisek
The Honorable William S. Cohen
U.S. Senator Barbara Boxer
U.S. Senator Dianne Feinstein
Congressman Brian Bilbray

Comment Number	Response

Robert E. Hafey

I.49.1 The traffic analysis presented in the Draft EIS is based on the incremental increase in traffic that would occur as a result of the proposed action. Currently, NASNI has the capacity to support two conventional aircraft carriers (CVs) and one nuclear carrier (CVN) for a total of three homeported carriers, while Alternatives One, Two, and Three would have three CVNs. The proposed action would not result in two additional aircraft carriers, but would provide the capacity to homeport two CVNs as a replacement for two CVs. As the number of personnel on the CVNs is slightly greater than that on the CVs, the proposed action would generate approximately 27 additional vehicle trips during the peak hours and 150 trips throughout an average day, as outlined in the EIS. The analysis indicates that a traffic increase of this magnitude would not be significant. Refer to the response to comment L.4.5 for a more detailed discussion of the homeporting baseline at NASNI.

I.49.2 While your comments do not address the adequacy of the EIS, they are noted and are included in the Final EIS.

I.49.3 Please see response to comment O.12.80 and O.13.28.

November 10, 1998

Mr. John Coon, Southwest Division (Code 05AL.JC)
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Dear Mr. Coon:

On the eve of Veteran's Day, it seems appropriate to submit my comments to you regarding bringing more nuclear-powered aircraft carriers to San Diego. DON'T DO IT! I.50.1

I understand the need for military preparedness, even though I wish such a need did not exist. However, I see no need to proliferate a device that can have catastrophic effects on the very people it is supposed to protect. I am talking about nuclear power. I.50.2

Given the fact that nuclear accidents DO happen, and HAVE happened already, and the fact that there already exists a proven alternative, it seems outrageous to continue building and deploying nuclear powered carriers (or nuclear-powered anything, for that matter). I do not want my tax dollars used toward that needless and horribly frightening end. As we all know, there is no "correcting" a nuclear mistake and the consequences are with us nearly forever.

According to the GAO report of August 27, 1998, conventionally powered carriers are able to meet the requirements of our national military strategy at a significantly lower life-cycle cost and without the current and future dangers associated with nuclear power. Why is this objective information being ignored in favor of continued usage of nuclear power? I.50.3

I accept, reluctantly, the fact that San Diego is a military town, but I do not accept it being used to house such dangerous devices unnecessarily. The Stennis should be deactivated and no further nuclear powered craft of any kind should be brought here or anywhere else. I.50.4

Listen to your government and the people whom it represents!!!

Seriously,

Stephanie Strout

Stephanie Strout
10502 Queen Ave.
La Mesa, CA 91941

Comment Number	Response
Stephanie Strout	
I.50.1	Your comments are noted and are included in the Final EIS.
I.50.2	Please see response to comment I.47.1 and O.12.55.
I.50.3	Please see response to comment I.47.1 and O.12.55.
I.50.4	Please see response to comment I.47.1 and O.12.55.

Mr. John Coon
Southwest DIVISION (Code 05AL.JC)
Naval Facilities Engineering Command
1220 Pacific Coast Highway
San Diego CA 92132-5190

November 10, 1998

Sir,

I am an American citizen and have lived and worked in San Diego for eleven years. I have 43 years experience with the military, both on active duty as well as in civilian life. I too have concerns for the environment in which we live. I recently attended the public hearing on the home porting of nuclear aircraft carriers in San Diego. Most of what I heard was against the proposition, and in many cases the speakers not only disparaged the US Navy but were insulting to the naval service and its representatives present that night. Not only do I disagree with these 'citizens', but I was embarrassed for them. I.51.1

My perception is that the Navy has in the past, and continues to err on the side of conservatism when it comes to environmental issues. Not only am I satisfied that the Navy in this instance of home porting taken every precaution to insure the safety of its crews and our citizens, but I know that the military takes enough risks during wartime without knowingly risking its personnel aboard ships at home, during peace time by exposing them to harm from nuclear spills(as they were accused of during the hearings).

A September 2nd letter by Congressman Bob Filner, and a more recent letter in the SD Union-Tribune written by a law professor questions the safety of nuclear ships. My answer is that the US Navy has been safely operating nuclear reactors since 1955. Our ships have sailed literally millions of miles on nuclear power since then without a reportable reactor accident. And while I'm not a physicist, nor can I run a reactor, I would venture to say that life aboard USS Stennis is safer than on a number of Bob Filners city streets. The nuclear safety record of the Navy over the course of the last fifty-plus years is impeccable and is the envy of the rest of the world!

Finally, I am very comfortable knowing that our navy is here in San Diego doing everything in it's power to protect our environment while protecting our country, enhancing the local economy and in general being a good, if not ideal neighbor.

Sincerely,

Charles L Zangas

PO Box 27348
San Diego, Ca 92198

Comment Number	Response

Charles Zangas

I.51.1 Your comments are noted and are included in the Final EIS.

November 11,1998

Mr. John Coon,

About six years ago, there was a nuclear "accident" near Springfield, Massachusetts. A truck carrying nuclear fuel rods was driving north on interstate 91. They were returning from being reprocessed in route to Vernon, Vermont. The driver had an accident and dumped his radioactive cargo all over the highway. There was never an emergency response team prepared to deal with this kind of disaster. To my knowledge, no one living in the area was ever notified of the accident. The officials said there was no danger from radiation...no need to worry. I found out about this whole situation from a friend who was living in southern California. She sent me a news paper article, assuming that I had already heard. At the time of the accident, I lived less than an hour away. I.52.1

Accidents do happen and they are covered up. First of all, I don't believe that nuclear power is safe. Second, I don't trust that the Navy would ever notify me in the event of an accident. I read over parts of the environmental impact statement. I did not read anything about how I, as an individual or my school would be notified when there is an emergency. I heard you say at the public hearing in San Diego that the Navy and city officials would be notified within a few hours, in the event of an emergency, and told when to evacuate. I, also, did not hear or read anything about an evacuation plan. I don't have a clue as to what the Navy actually considers an accident worth mentioning. How many "incidents" just get brushed aside as all in a day's work?

I.52

I can not accept any of your proposals for more CVN's. Alternative 5 may look good to me for San Diego but I do not believe in dumping what I don't want on someone else. We do have one nuclear powered aircraft carrier and a number of nuclear submarines. I need to know that all of these nuclear reactors are being monitored on a twenty-four hour basis, by an organization other than the Navy. I want all information on releases and shipments of waste to be made public. I don't mean a book in the library. I want it announced on the radio and on the front page of the local papers. I am holding you accountable for this "nuclear megaport". You , the Navy, are responsible for the health and well-being of millions of people in southern California and northern Baja, Mexico. You are responsible for the health and well-being of all the plants and animals that inhabit San Diego Bay and nearby ocean areas. I.52.2

I have been told by scientist friends that the next large earthquakes are due to occur in the next five to ten years. There have been two earthquakes larger than magnitude six in San Diego since 1800. One was near the harbor. I didn't read anything about what you will do when there is an earthquake. What are your plans regarding your nuclear reactors when there is a large earthquake? I.52.3

How will you transport your low level nuclear waste? You are currently producing nuclear waste. Do you know that there will be a place to store that waste permanently and safely in the future? What are you planning on doing wh en Hanford shuts down? How will you notify people in that area that there is radioactive material stored there and how will you keep people out of the contaminated area? I.52.4

I never approve any proposal unless all of my questions have been answered to my satisfaction. I will not treat the Navy diferently. I can not accept or approve of any of your proposals for homeporting CVNs in San Diego Bay. I.52.5

Sincerely,

Bryn Anderson

Ms. Bryn Anderson
3364 Grim Ave.
San Diego, Ca. 92104

Comment Number	Response

Ms. Bryn Anderson

I.52.1 Section 7.4.3.4 of the EIS, which describes the Navy's radioactive material transportation, states that there have never been any accidents involving release of radioactivity during shipment of NNPP radioactive waste. In particular, section 7.4.3.4 of the EIS states that shipments of radioactive material associated with the Naval nuclear propulsion plants have not resulted in any measurable release of radioactivity to the environment. For correctness, section 7.4.3.4 will be revised by inserting "a significant" between "involving" and "release."

Please also see responses to comments O.10.31 and O.12.81.

I.52.2 Potential impacts to marine life have been evaluated carefully in the Final EIS, as detailed in Volume 1, section 3.5. Potential impacts are either less than significant or mitigated to less than significant by such means as construction of the mitigation site at Pier B. Further, as part of the dredged material disposal plan a habitat enhancement area would also be constructed at NAB that will provide about 6-8 acres of additional higher quality habitat for marine organisms in the bay. Please see responses O.10.23 and O.12.33.

I.52.3 The Navy addresses the effects of earthquakes, tsunamis, and seiches with respect to the proposed action in section 3.1.2.4.

I.52.4 Radioactive waste storage and transportation issues for NASNI are discussed in sections 3.15.2 and 7.4.3 of the EIS. Issues pertaining to the operations at Hanford are beyond the scope of this EIS.

I.52.5 Your comments are noted and are included in the Final EIS.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Beth Bailey

Address: 8858 Millburn Ave. Spring Valley, CA 91977 (1)

COMMENTS:

It's the Navy's responsibility and purpose to prepare for and conduct war. The purpose of war is to protect the well-being of our citizens and the nation's "interests." Before we go to war and any military personnel are put in harm's way, the risks and importance of the interests at stake are weighed. But with the homeporting of nuclear aircraft carriers in S.D., the very preparations aimed at our protection are putting all our citizens in harm's way and jeopardizing our most basic interests. What is more important than air and water and food sources and ground to live on that do not contaminate our bodies with toxic + life-threatening substances? I.53.1

Although I am sure there is a high level of concern and professionalism and discipline among naval nuclear technology personnel, human beings are fallible, and we all know computers are. Just because an accident hasn't happened, doesn't mean it won't,* especially after upping the odds with several new reactors (* witness the New Jersey battleship whose main gun blew up). And how can all possibilities of foul-play be ruled out? These are times of rapid change, only to accelerate over the 50 yr. lifespan of the carriers. How can

Beth Bailey
Signature

11-11-98
Date

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DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: _____

Address: _____

(2)

COMMENTS:

such a big complex institution respond quickly enough to changing capabilities and conditions to rule out a fluke successful terrorist or sabotage act that would have consequences so unthinkable that a realistic response has not even been formulated, let alone communicated to those who would be responsible for implementing it? Furthermore, there is a conflict of interest in disseminating these emergency plans because of the resistance to the aircraft carriers' presence the scenarios may incite, as well as the attention it might draw from potential terrorists. I.53.1

I.53.2

To say that in this rapidly changing, ever more complex world, the Navy is capable of 5 decades of control complete and constant enough to be able to assure 5 million plus people that the very most basic elements necessary for them to live will not be jeopardized by the presence of these billions of particles of "the most toxic substance known to man," (Plutonium) is Hubris - an arrogant tragic over-reach. Who will manage and control the added 1,000's of tons of low and high level nuclear waste generated for the hundreds or thousands of years it is dangerous? From what I know about transport and storage technology of nuclear waste, you can't assure your grandchildren and great grandchildren and theirs that it will not reach their ground water.

Signature _____ Date _____

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DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: _____

Address: _____

(3)

COMMENTS:

There has never been a battle with the kind of far-reaching inestimable damage/consequences of the "worst case scenario" that must be considered with the home-porting of nuclear carriers in this highly populated prime target military port city. I.53.3

The fact that the Navy's literature harks back to the PAST 50 years and its EIR offers woefully inadequate contingency plans for emergency evacuation or ongoing assessment and amelioration of conditions that negatively impact the health of the people living and working closest to the carriers and facilities is not reassuring. We are only beginning to study and understand the long-term effects of even small exposures to radioactive elements. I.53.4

What provisions will the Navy make for accurate objective monitoring of the impact of its nuclear presence on surrounding populations - human or otherwise? What arrangement for the open sharing of information pertinant to civilian and Naval personnel health concerns? What express responsibility will the Navy/govt take for protecting ~~health~~ the citizens of the region from any negative impact of its nuclear presence? some? none? What assurances can the Navy offer when in the case of "Agent Orange", where similarly, considerable numbers of people were negatively affected, one commander (despite written rules prohibiting interference in the study) was able to withold for almost a decade crucial information and compensation and help from Navy personnel who had served and suffered in battle and their families. This commander, being involved I.53.5 (cont on back page)

Signature Date

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Continued from page (3)

in the decision to use "Agent Orange," reportedly stated he wouldn't be able to live with himself if some of the study's implications proved to be true, so he suppressed them. In this tacit cost-analysis, the cost to his ego carried more weight than the suffering of those many families affected. Humans beings are fallible. And the Navy is run by humans beings who may be quite out of touch with the people their decisions affect. I.53.5

What part of the cost of potential negative health affects is the Navy willing to take responsibility for? I.53.6

Or are we, the citizens of the surrounding area expected to

fold

bear all the costs? At what point would the Navy consider the costs too high? With studies taking so long (if they're lucky enough to be funded), and then response on the part of the government taking just as long or longer, even good faith assurances are meaningless during the possible 10+ year period before a decision is taken.

Place 32-Cents Postage Here

(Return Address)

Mr. John Coon
Southwest Division (Code 05AL.JC)
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Again, I appeal to your dedication to your basic duty to the ~~safety~~ of American citizens. May that sincere dedication

fold

guide you in carefully considering and responding to the issues herein..

Sincerely,
Beth Bailey

P.S. In addition to the general issues above, I am also concerned about the particular metallurgical problems addressed by Dr. Siegel at the hearing. Please see that these are specifically investigated and reported on. Also, the Y2K issues. I.53.7

Comment Number	Response

Beth Baily

I.53.1 Please see response to comment I.12.9, O.12.10, and I.47.1.

I.53.2 Radioactive waste storage and transportation issues for NASNI are discussed in sections 3.15.2 and 7.4.3 of the EIS. Issues pertaining to the management of spent nuclear fuel are beyond the scope of this EIS.

Management of spent fuel associated with the NNPP is addressed comprehensively in an EIS published by the DOE and the Navy titled, Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement dated April 1995. That EIS concluded that U.S. Naval spent fuel can be safely managed with negligible environmental impacts pending its ultimate placement in a permanent geologic repository as prescribed in the Nuclear Waste Policy Act.

I.53.3 Please see responses to comments O.12.190, I.12.9, and I.47.1.

I.53.4 Please see responses to comments O.12.190, I.12.9, and I.47.1.

I.53.5 Please see response to comment L.4.36.

I.53.6 Please see response to comment I.12.9.

I.53.7 Please see responses to comments I.63 and O.12.57.

CONGER-CROSS CHOCOLATES

2850 Skyline Drive, Lemon Grove, CA 91945

11/12/98

Dear John Coon,

This is a letter to protest the Navy's plan to place more nuclear-powered aircrafts in San Diego. Conventionally powered carriers would be less costly & much more environmentally safe. I.54.1

The GAO report of Aug 27, 1998, Navy Aircraft Carriers: "Cost-Effectiveness of Conventionally and Nuclear Powered Carriers" states: "Nuclear-powered carriers cost more than conventionally powered carriers to acquire, operate and support, and to inactivate..." These cost do not take into account the cost of storing the spent nuclear fuel after it has been refueled.

I have lived in San Diego County since I was a baby some 40+ years. We need the Navy but not nuclear powered carriers.

Sincerely

Carl Conger-Cross

(619) ~~461-5089~~ 463-2618

Comment Number	Response

Carol Conger-Cross

I.54.1 Please see responses to comments I.47.1 and O.12.55.

11-12-98

Mr. Coon
Southwest Division
(Code 05A.LJC)
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

re: Homeporting of CVN's in San Diego

I strongly oppose the homeporting of nuclear-powered aircraft carriers in San Diego. The health risks they pose to such a densely populated area are far & away too great to be justified by our "national security needs."

I.55.1

The Navy's DEIS is inherently flawed as it fails to address the cumulative impacts of the two additional carriers. It also glosses over the highly relevant issue of cancer mortality & low-level radiation exposure.

I.55.2

Possibly the most egregious omission is the lack of a real emergency plan including distribution of potassium iodide to civilians.

I.55.3

Also, why make San Diego a sitting duck target for any simple-minded terrorist? Did we learn nothing from Pearl Harbor?

I.55.4

Please heed the warnings of such informed activists as Carol Jahnkow (P.R.C.), Dr. Dan & Z Kripke (PRS), Laura Hunter (E.H.C.) & other experts who have made their appeals.

I.55.5

In peace,
Dr. Jennifer W. Downes
Urgent care physician in San Diego since 1984

Comment Number	Response

Dr. Jennifer W. Doumas

I.55.1 Your comments are noted and are included in the Final EIS.

I.55.2 Cumulative impacts related to the preferred alternative at NASNI are discussed in section 3.18. The text has been revised to clarify the spatial and temporal relationships of the proposed action and reasonably foreseeable projects, in evaluating their combined, cumulative effect. Please see response to comment O.12.158 and O.12.190.

I.55.3 Please see response to comment O.12.78 and O.10.31.

I.55.4 Please refer to responses L.4.44 and I.37.1 in the San Diego responses to comments on the subject of "sitting duck targets."

I.55.5 Your comments are noted and are included in the Final EIS.

Reproduction clarity limited by quality of comment letter received.

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

(Must be postmarked by deadline)

Page (1)

DRAFT EIS COMMENTS

Name: Susan J. Randerson

Address: 831 Golden Park, San Diego, CA 92106

COMMENTS:

I attended a hearing in San Diego on October 25, 1995 regarding the homeporting of 2 more nuclear aircraft carriers (CVNs) in San Diego Bay. I am deeply concerned about the harm this could do to the environment and the danger to the inhabitants of San Diego. I.56.1

We were told there would be no "significant effects" on the environment. What does "significant" mean? I assume sea water will be pumped as a coolant for the reactors. How much radioactive material would be in the water returned to the bay? This perhaps "insignificant" amount of radioactivity would be absorbed by the plankton & other small organisms, to be eaten by larger animals & concentrated as it moved up the food chain, providing a significant danger over time to fish, birds, seals and people (who eat the fish) at the top of the food chain.

Recent studies have shown that much lower I.56.2

(continued

Susan Randerson
Signature

11-12-98
Date

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DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Page (2)

DRAFT EIS COMMENTS

Name: Susan J. Randerson

Address: 531 Golden Park, San Diego CA 92106

COMMENTS:

levels of exposure to radioactivity over a long time period are much more harmful than previously believed. Tiny levels of radioactivity over a long period have produced increased rates of cancer, birth defects, etc. I.56.2

What will be the impact of dredging the equivalent of 2 Qualcom stadiums of bay sediment, much of it contaminated, on the water column, and the animals in the bay water & on the bottom? I understand the last "mitigation project" destroyed the intertidal habitat. The protection of the intertidal habitat was not addressed by the DEIS, although it is required to be addressed according to law (the Clean Air Act). I.56.3

Concentrating 18 nuclear reactors in one location is inviting terrorism or attack - making San Diego a vulnerable desirable ~~nuclear~~ target. The rationalization that these CVNs are needed for our defense loses its meaning when you risk ruining one of the most beautiful bays & regions in the U.S. and the destruction of the 6th largest city with nearly 2 million people I.56.4

(continued)

Signature Susan Randerson Date 11-12-98

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DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

page (3)

DRAFT EIS COMMENTS

Name: Susan J. Randerson

Address: 831 Golden Park, San Diego, CA 92106

COMMENTS:

What is the advantage of CVNs, which cost $5 billion dollars apiece to build, over a million dollars a day to operate and over $750 million to decommission? A recent independent GAO study found them not cost effective over conventional carriers (CVs). There is no safe place for permanent storage of nuclear wastes. Our nation's success & well being as well as security would be much better served by spending this money on education and health care. OUR PRIORITIE ARE WRONG! I.56.5

I have many more deep concerns, not the least of which is the danger of a nuclear accident. This & many other issues are not adequately addressed in the DEIS. Also, much of the data in the DEIS was outdated &/or inaccurate. Please redo the DEIS, have more hearings where San Diegans can have a say in their future safety & quality of life - above all, please reconsider the homeporting of any more CVNs here. Thank you. I.56.6

Susan Randerson
Signature

11-12-98
Date

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Comment Number	Response

Susan J. Randerson

I.56.1 While CVs and CVNs use different sources of fuel (oil vs. nuclear), both types of ships rely upon steam propulsion plants that require seawater cooling. As described in section 7.2, the primary system (which circulated through the reactor) is isolated from the secondary system (which circulates through the steam plant) to ensure radioactivity is kept within the primary system. In addition, the water used in the steam plant does not contact the seawater used for cooling. The seawater cooling requirements are similar and the thermal and marine life impacts from CVs and CVNs are comparable. In addition, please see response to comment O.12.33.

I.56.2 Please see response to comment O.12.190.

I.56.3 Potential impacts to water quality and aquatic organisms from dredging operations in San Diego Bay are discussed in sections 3.3 and 3.5, respectively, of the EIS.

The USS STENNIS mitigation site was constructed in accordance with permit conditions set forth by the resource agencies. The new wharf mitigation site design would be based on one of two options, intertidal or intertidal/subtidal, to be determined by the agencies during permitting as mitigation for the 1.5 acres that would be impacted. Also please see additional details summarized in the responses to comments F.2.10 and F.2.11 and clarification provided in Volume 1, section 3.5.

I.56.4 Please refer to responses L.4.44 and I.37.1 in the San Diego responses to comments on the subject of terrorism and attacking aircraft carriers in San Diego. The No Action Alternative in the EIS does not propose any additional capacity to home port CVNs, or add additional vessels to the three-carrier historical baseline that has existed at NASNI for several decades.

I.56.5 Our publicly-elected U.S. Congress and President of the United States make programmatic decisions regarding Naval ships (e.g., application of nuclear power), and thus comments regarding these decisions are beyond the scope of this EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities. Please see also response III.O.12.55.

I.56.6 Please see the response to comment I.56.5, above.

Nov. 2, 1998

Jeff Coon Project Mgmr.
S. west Division Naval
facilities Eng. Command:

Sir:

I object to nuclear-
powered aircraft carriers [3]
in San Diego bay. With
all the trouble in the
world today and especialy
Iran. I don't feel that is
safe at all. What could
prevent some Enemy
from acting such as
Japan did to Pearl Harbor
doing the same to us.
Dear God! This is
all I feel. I worry!
Of course my time is
getting short on this
earth but I do have

I.57.1

offspring. I would like
to see a safe happy
world for them & all others
I would like to know
where this idea originated
from and more about this.
A most unhappy mother
grand mother & great grandma
Mrs. Virginia A. Miller
3929 Kansas St.
#12 San Diego, Ca.
92104
PS Say No! 1st time
I still can't believe it!

I.57.1
I.57.2
I.57.3

Comment Number	Response

Virginia A. Miller

I.57.1 Your opinions are noted and are included in the Final EIS.

I.57.2 As stated in the Draft EIS under the section "Need for the Proposed Action," "The Navy has established a Pacific Fleet Force Structure consisting of six aircraft carriers. Five of these vessels are or will be assigned to ports (homeported) at Navy installations in the continental United States. Three of these are homeported in the San Diego area and two are homeported in the Pacific Northwest area. A sixth carrier is forward deployed in Japan. The closure of Naval Air Station (NAS) Alameda, California, and the relocation of two CVNs to fleet concentrations in San Diego and the Pacific Northwest were carried out in compliance with the 1993 Defense Base Realignment and Closure Commission (BRAC) recommendations. Consequently, the Department of the Navy constructed homeporting facilities for one CVN at NASNI (DON 1995a) and one at Puget Sound Naval Shipyard (PSNS), Bremerton, Washington (DON 1995b). The proposed action of this EIS does not involve a reexamination of homeporting actions directed by the 1993 BRAC process, and does not address the carrier forward deployed in Japan.

"Of the six aircraft carriers homeported in the U.S. Pacific Fleet, three are currently NIMITZ-class CVNs. The CVN is a newer class of aircraft carrier requiring different homeporting shore infrastructure (e.g., electrical power and water depth). The three existing CVNs are assigned to home ports at PSNS; NAVSTA Everett; and NASNI. Pearl Harbor Naval Shipyard, (PHNSY), a part of the Pearl Harbor Naval Complex in Hawaii, is within the U.S. Pacific Fleet area and is considered a potential CVN home port location (see Figures ES-1 through ES-3 in the Final EIS).

"In 1994, the Chief of Naval Operations (CNO) announced Navy-wide homeporting plans, which included plans to replace two older CVs with two new CVNs in the U.S. Pacific Fleet. The Navy must select home ports and construct facilities as required for the two new CVNs to be added to the U.S. Pacific Fleet; the first by 2001, and the second by 2005. Therefore, the need for the proposed action is the lack of acceptable CVN home port facilities and infrastructure in the U.S. Fleet area of responsibility (AOR)."

I.57.3 Your comments are noted and are included in the Final EIS.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: Cam Martinez

Address: 4587 39th St. #5, San Diego, CA 92116

COMMENTS:

I.58.1

I do not want a nuclear megaport in San Diego. It is not safe. Contrary to your flawed EIS report. The environment is already suffering greatly and this will only make it worse. All life will sustain even more problems than what already exists. This country doesn't need any more nuclear anything. It is totally unnecessary and a waste of money. There is no proper emergency plan and no proper plan for disposal. We don't need anymore problems. Stop this plan Now! We don't want to be a target either!

Cam Martinez
Signature

11/5/98
Date

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Comment Number	Response

Cam Martinez

I.58.1 Please see response to comment O.10.31 and I.5.1.

November 6, 1998
McLane Downing
2416 Grandview St
San Diego, CA 92110-1146
(619) 276-8532

John Coon, Project Manger
Southwest Division, Naval Facilities, Engineering Command
Code 05AL-JC
1220 Pacific Highway
San Diego, CA 92132

Subject: Homeporting Two More Nuclear Carriers

Dear John Coon:

Homeporting two more nuclear carriers increases the health and safety risk. This is a densely settled area, and any incident would affect lots of people. I.59.1

I would like to see the health risk of an incident explained in common english. The assessment should include the demographics of this area, including the population below the border. I.59.1

Dredging should protect marine life, including all life in the bay. I.59.2

I suggest that baseline data be obtained for radioactive levels in and around the bay. Then monitoring the levels, analyzing the data, and reporting information to the public should be assigned to an agency outside of the Defense Department. I.59.3

Very truly yours

McLane Downing

Comment Number	Response

McLane Downing

I.59.1 To place the results of the analyses in perspective, Volume I, section 7 of the EIS states, "The radiation exposures to the general public due to normal operations would be so small at each of the home port locations that they would be indistinguishable from naturally occurring background radiation. For example, the highest exposure to a member of the public in any year due to normal operations would be less than one millirem (0.66 millirem at Everett). This value can be compared to the 300 millirem of radiation exposure the general public receives each year from naturally occurring background radiation. Also, the results show that the annual individual risk of a latent fatal cancer occurring in the general population within 50 miles of a NIMITZ-class aircraft carrier home port is very low at each of the home port locations evaluated, less than 1 chance in 2 billion." It further states in Volume II, Appendix F of the EIS, "the annual individual radiological risks to a member of the general population due to accidents associated with support facilities for homeporting of NIMITZ-class aircraft carriers are very low at all of the locations evaluated, less than 1 chance in 580 million." For perspective, the annual risk of dying in a motor vehicle accident is about 1 chance in 6,250. Similarly, the annual risk of dying in a fire for the average American is approximately 1 chance in 36,000; and the annual risk of dying from accidental poisoning is about 1 chance in 72,000.

As discussed in Appendix F, section 2, population distribution and prevailing wind directions are factors that are accounted for in the risk analysis for the general population. Risks to the Mexican population are also assessed in this Appendix as well. Based on the above, no change to the EIS is deemed necessary.

I.59.2 Potential impacts to marine life has been evaluated carefully in the Final EIS, as detailed in Volume 1, section 3.5. Potential impacts are either less than significant or mitigated to less than significant by such means as construction of the mitigation site at Pier B. Further, as part of the dredged material disposal plan a habitat enhancement area would also be constructed at NAB that will provide about 10 acres of additional, higher quality habitat for marine organisms in the bay.

I.59.3 Please see response to comment O.12.33.

November 6, 1998

Dolores Thompson
4545 Georgia Street #101
San Diego, CA 92116-2675

Mr. John Coon (Code 05AL. JC)
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132

Dear Mr. Coon,

I would like to thank the U.S Navy for granting us a public hearing regarding the DEIS. However due to the seriuness of the situation I feel that the Secretary of Navy should come to San Diego and hear what the people and their children have to say concerning this matter. His visit is pertinent especially since the people of San Diego would be the target of a "Three Mile Island " accident. I.60.1

Also, the U.S. Navy did not address the major questions ie: What is done withe nuclear waste material. How much radiation admission is there in the air. What measures is being taken that San Diego does not become another Three Mile Island accident. I.60.2

Since the officials present could not address these questions perhaps the Secretary of the Navy can. I respectfully reqesst the he come to San Diego if not for any reason then for the sake of the children. I.60.3

Sincerely,

Dolores Thompson

Comment Number	Response

Dolores Thompson

I.60.1 Two public hearings on the Draft EIS have been held in the San Diego region and public testimony received, as required under NEPA. The Navy does not currently have plans to have a follow-on community workshop for an informal dialogue. Concerns generated during the public review of the EIS will be considered by Navy personnel responsible for making decisions regarding the proposed action. Navy representatives at the EIS public hearings are directly involved with this decision-making process, and provide recommendations to the Secretary of the Navy regarding the preferred alternative to be implemented.

Furthermore, the Navy ensures that the EIS decisionmaker has a complete copy of the public hearing transcripts. The Navy believes that the objective sought by the comment is met by the fact that the transcript of the public hearing is prepared and reviewed as part of the NEPA process leading up to the Record of Decision.

I.60.2 Please see responses to comments L.4.37, O.10.31, O.12.33, and I.53.2.

I.60.3 Please refer to response I.60.1

An Open Letter To The Residents Of The San Diego/Tijuana Region

I.61.1

I'm writing this letter because I'm frightened. I'm afraid for my community, for our children, and for future generations. Why?

Because the U.S. Navy is moving forward with "homeporting" 3 or more nuclear aircraft carriers, in San Diego Bay, one mile up wind of the heart of downtown San Diego and upwind of the almost 5 million people living in our region, depending on which way the wind is blowing. Three nuclear aircraft carriers have 6 nuclear reactors between them with a combined reactor capacity exceeding that of a Three Mile Island or Chernobyl reactor.

At this point I want to make one thing very clear. This is not a letter against the Navy. The Navy, along with all the other branches of the military have served the United States well, but the Navy, like any institution, is not infallible in its judgment.

According to the Navy's estimates, the chances of a significant "accidental" release of radioactive materials into the air from the carriers or their supporting storage and processing facilities is very small. But the chances of winning the lottery "jackpot" are also small, but people still win it on a regular basis.

But beyond long odds for an accident, the potential for terrorism and/or the act of a bitter, disgruntled, drunk, disturbed, and/or insane sailor means that all bets are off in the game of odds.

The whole reason we fund the Navy with our tax dollars is to protect our right to pursue "life, liberty," and "happiness." This given, I'm at a loss to find any rationale that would remotely indicate that homeporting these Nuclear Carriers in the heart of San Diego will make our region, and indeed the U.S. or Mexico more secure from either a civilian or military perspective. In fact the opposite is true. Basing the carriers here means that a small group or even an individual would have the power to render our region unsafe to inhabit for tens if not hundreds of years plus, cripple the Navy's ability to protect us militarily by taking out 3 or possibly more nuclear carriers and who knows how many Navy personnel and civilians.

How could this happen? Well for openers, terrorists could drop bombs from small planes and/or helicopters on the carriers or their storage and processing facilities. A suicide bomber could fly a plane or helicopter loaded with explosives into the carriers. The carriers can be attacked with underwater explosives. They could also be attacked by ramming them with boats filled with explosives. A mentally unstable and/or vengeful sailor could blow reactors with explosives or tamper with reactor computers and controls to cause radioactive meltdowns.

Let's face it, these carriers will be very attractive sitting ducks from a terrorist's perspective or the perspective of some clever nut out to get even for some real or imagined transgression.

Finally, blowing up reactors or causing their safety measures to fail is not comparable to other disasters we are more familiar with. For example, if the carriers the Navy wants to homeport here were oil powered, their destruction, whatever the cause, would certainly be a disaster, but shortly after the fire burned out workers could begin the salvage and cleanup operation.

This is not the case with nuclear powered vessels and their support facilities. Unlike the chemicals generated by simple combustion, the radioactive fallout from a nuclear associated fire will continue to hurt us, our children, future generations, and life in general on cellular, genetic, and atomic levels for tens, hundreds, and potentially thousands of years. Like I said, an incident involving the release of significant amounts of radioactive material is incomparable with the kind of disasters with which we are use to dealing.

After what I've just said, it seems almost trivial to mention it, but homeporting could have a negative affect on our tourist and real estate driven economy. If the release of even a moderate amount of radioactive material hit the news, the tourist and real estate industries in our region would suffer a devastating if not fatal blow. There have already been international travel advisories published and broadcasted warning tourists about our polluted bays and ocean. Does it make sense to add the danger of radioactive contamination to such advisories?

What should be done? To begin with, the Navy or any other branch of the military should "homeport," "base," and/or "store" nuclear machines, devices, and their support facilities as far away from population centers as possible. And particularly from the Navy's perspective, ships should not be clustered. It seems we should have learned that lesson from Pearl Harbor.

If nuclear powered vessels are homeported separately and in remote locations they would be much easier to defend. Plus, if a reactor core is breached for what every cause, the Navy only loses one ship and the danger of civilian populations being contaminated by radioactive materials would be lessened.

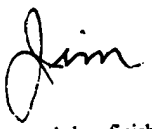
As I said in the beginning, I'm writing this letter because I'm afraid for the future of our region, its people, and the other forms of life that share it with us.

There are many other things we are doing, like building in floodplains and turning our best agricultural soils into shopping centers, that threaten our region's future well-being, but none of these acts even come close to being as devastating as the radioactive contamination of our region's people and land. Any other assault on our region's ecological health, short of the extinction of a species, can be undone. This is not the case when radioactive contamination is widespread, since undoing it is beyond human capability. If such contamination occurs, it will be a blow to life that only immense amounts of time will hopefully heal.

Why allow ourselves to be put in a situation that makes us potentially vulnerable to the release of more radioactive materials than was released at Chernobyl? When there's so much to lose, why take on such a risk when we don't have to? If enough of us let our elected representatives and the media know that homeporting nuclear powered vessels in the middle of San Diego Bay or any densely populated region is frightening, irrational, and unacceptable, homeporting here can be stopped.

I love our region. I enjoy sharing it with all the people who live here. I love our promise. I love our potential. I've always considered this region my home for life, but now, for the first time, I'm seriously considering moving away. Not so much because I want to save myself, I've already lived a pretty full life, but because I don't think I could stand to look in the faces of our children if homeporting happens, knowing that it represents the potential to completely ruin their lives on every level. Let's all work together to ensure that this does not happen.

I.61.1 Peace & love



Jim Bell was the second place finisher in the 1996 Mayor's race for the City of San Diego. He's also an internationally recognized expert on how to gracefully transform non-sustainable economies into economies that are completely ecologically sustainable. His radio show, "Jim Bell & Common Sense," airs weekly on KFMB, 760 on the AM radio dial, Sunday evenings from 10 to 11 PM. The show can also be heard live world wide, by logging into KFMB's web page via www.jimbell.com. Jim's book, Achieving Eco-nomic Security On Spaceship Earth, is available on his web site free of charge. Jim is also available for lectures, workshops, and design and consultation services. For more information about this letter or other projects, call (619) 272-2898.

Comment Number	Response

Jim Bell

I.61.1 Our publicly-elected U.S. Congress and President of the United States make programmatic decisions regarding Naval ships (e.g., application of nuclear power), and thus comments regarding these decisions are beyond the scope of this EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

DEVELOPING HOME PORT FACILITIES FOR THREE NIMITZ-CLASS AIRCRAFT CARRIERS IN SUPPORT OF THE U. S. PACIFIC FLEET.

DRAFT ENVIRONMENTAL IMPACT STATEMENT

RESPONSE FROM A U. S. CITIZEN AND SAN DIEGO COUNTY RESIDENT FOR INCLUSION WITH PREVIOUS ORAL AND WRITTEN SUBMISSIONS FROM THE UNDERSIGNED.

From: Russell D. Hoffman
P. O. Box 1936 Carlsbad CA 92018-1936 (760) 720-7261
November 10th, 1998

Additional Remarks:

My oral remarks concerned the clear and indisputable history by various branches of the United States Military, including the U.S. Navy, of misrepresenting the true dangers of low level radiation to the American public. These misrepresentations have resulted in the deaths **already** of at least 10s of thousands and probably hundreds of thousands of U. S. civilians (and perhaps even more soldiers) from nuclear weapons testing alone. Add to that, the damage to the ecosystem from the Scorpion, the Thresher, and a long list of smaller unclassified and undoubtedly many classified other nuclear accidents, and it is crystal clear that the real damage has only begun to occur, and many more lives will be wasted by our current and planned military nuclear policies. I.62.1

I.62

However, it will be many more years (if ever) before the real effects are completely quantifiable with available statistical methodologies and analytical technologies, because of the widespread and insidious nature of the effect. Statistics itself, as a separate branch of science and mathematics, is only a few decades old! The science of health physics is even younger -- younger even than the harnessing of the "mighty atom" whose health effects health physics seeks to explain. Yet the trends are clear and just because an effect is hard to measure does not mean it does not exist and is not responsible for 10s of thousands, hundreds of thousands, and perhaps even millions of deaths globally and in the United States.

The nuclear option, whether used or unused, is a weapon of mass destruction. It is both a target for terrorists and a tool of fascists (because it concentrates so much power in the hands of so few).

Yet the Navy continues to support this option. Why?

History clearly shows from the government's own documents and from a wide variety of other sources, that the nuclear option was often supported in part because the evidence of the true hazards of low-level radiation to a closed ecosystem was not yet available (see sample, below). But in those cases, including in the case shown below (the "Manhattan" project), little real effort was made to actually obtain this vital information. And indeed, it is very hard evidence to obtain, requiring 10s of thousands or even 100s of thousands of test subjects, which introduces all sorts of statistical problems in itself, not to mention the logistic ones, or the cost. But slowly, the truth is showing itself and it continuously I.62.2

points closer and closer in one direction -- that low level radiation is far more dangerous than originally suspected. I.62.2

In other cases, where various truths were actually known but not presented properly to the public, it was often done under the name of National Security or some other misnomer. In fact any conceivable "National Security" issues are *obliterated* by the overriding concerns of human health, not to mention the wasted additional money the nuclear option costs over non-nuclear options, and the endangerment to the world's environment that an accident (including possible enemy action) could have. (The Russians are now reported to have a better cruise missile than the French Exocets I mentioned in my other remarks.) The DEIS covers only the health effects of a properly functioning reactor, which is uselessly incomplete considering all the fuel and ordinance kept so close to the reactors -- and considering also, the 1500+ mile range of typical cruise missiles. In today's paper are reports of three Navy air crewmen who were lost just this week, due to a collision of two planes *on board* a United States Aircraft Carrier deck. *Accidents do happen!* I.62.3

The preposterous claim that no accident or enemy action can destroy these ships and cause a loss-of-coolant accident is implicit in the DEIS's failure to properly consider the hazards of full-scale meltdowns in our harbors. Further, the lack of concern over "the dilution solution to pollution" (that is, the effects worldwide of increased radiation levels over time) is bad science, plain and simple. Lastly, the inability of the Navy to understand its greater role as a part of a geopolitical/environmental situation is frightening, if only because the Navy should be thinking globally since it certainly acts globally. Numerous countries (besides America!) do not want these things ported in their harbors! If some poll shows the American civilian has been fooled into favoring the Navy's nuclear options, it is only because decades of misrepresentations by the U. S. military, like the current DEIS and like the item below, that they (the public) have agreed to be part of the costly nuclear terror. I.62.4

The following quote is from the same book my oral quotes from H. D. Smyth were taken from -- A GENERAL ACCOUNT OF THE DEVELOPMENT OF METHODS OF USING ATOMIC ENERGY FOR MILITARY PURPOSES UNDER THE AUSPICES OF THE UNITED STATES GOVERNMENT 1940-1945. The author, H. D. Smyth, was at the time Chairman of the Department of Physics of Princeton University and "Consultant to Manhattan District U. S. Corps of Engineers". The report was written at the request of Major General L. R. Groves United States Army. Publication was authorized as of August 1945, with reproduction in whole or in part authorized and permitted. In short, this document was the official report to the American public about the atomic bomb at the time of its initial development and use. Regarding radiation from an atomic blast, it uses the phrase "dispersed harmlessly", which we now all know to be utterly devoid of fact, yet it is a statement hauntingly similar to the entire attitude of the United States Navy to the truth about radiation hazards. The quote is from page 154. **Bold has been added to highlight the misrepresentation**: I.62.5

"On account of the height of the explosion practically all the radioactive products are carried upward in the ascending column of hot air and **dispersed harmlessly** over a wide area."

I.62.5

Harmlessly? That is easy to prove false -- look at the effects of Iodine 131 from barely 100 above-ground U. S. nuclear tests as recently reported (after a 14-year wait since the investigation was completed). The only question is are there 4 zeros, 5 zeros, or more in the total number of civilian U.S. deaths so far from U.S. nuclear weapons testing? The fact is it wasn't harmless and the statement, like so many others, was a complete misrepresentation to the American public. **Low-level nuclear radiation kills in numbers the U.S. military apparently refuses to understand, whether that radiation comes from nuclear weapons testing, harbor meltdowns, or from sunken reactors over time. The Navy's claim to being able to handle these materials to the required level of perfection is both mathematically absurd and morally repugnant.**

Clearly, it is time to face the truth of the nuclear menace to humanity, and it is time for the United States Navy and other branches of the military to realize that their service to America must include fair concern for delayed and dispersed responses (a.k.a., "health effects") to their actions.

I.62

It has been more than 50 years since the public was first misinformed about the incredible cost of these deadly toys, and it's been long enough. The Navy must face the truth, must present the truth, and must serve the public properly in all it does. The 50-year lie to the American people must come to an end, lest other countries, that are even more capable of hiding the truth from their citizens, also take up the nuclear lie. (India and Pakistan quickly come to mind, each with more than a 90% illiteracy rate.)

Lastly, I wish to state that the Navy policy of not simply distributing Environmental Impact Statements directly to any U. S. citizen who requests one is in complete opposition to the spirit of the laws under which the EISs and DEISs and so forth are produced in the first place. My own request for one has so far been turned down, which is the reason my statements do not address actual remarks inside the document. I have had some chance to look over it, and it clearly follows the trends described in this letter and in other government nuclear EISs and DEISs (not to mention SEISs and DSEISs) I have seen. They all ignore worst-case scenarios and low-level effects.

I.62.6

Sincerely,

Russell D. Hoffman
P. O. Box 1936 Carlsbad CA 92018-1936
United States Citizen

Owner and Chief Programmer,
The Animated Software Company
(for affiliation purposes only)

Comment Number	Response

Russell D. Hoffman

I.62.1 It is important to note that since the inception of the NNPP almost half a century ago, there has never been a reactor accident associated with the Program, nor has there ever been a release of radioactivity that has had a significant effect on the public or the environment. The Navy's historical record of safe and responsible operation of nuclear powered warships is discussed in Volume I, section 7 of the EIS.

In section 7.1.4 of the EIS it is stated that "Two nuclear-powered submarines (USS THRESHER and USS SCORPION) sank during operations at sea in the 1960s. Neither was lost due to a reactor accident . . . Radiological surveys of the debris sites have been performed on several occasions over the past three decades and confirm that, despite the catastrophic nature in which these ships were lost, no detectable radioactive fission products have been released to the environment."

The EIS has evaluated a wide variety of accidents and has determined that the radiological risks are not significant. A summary of risks is contained in section 7.6 of the EIS.

I.62.2 Please see response to comment O.12.190.

I.62.3 Please see responses to comments O.12.49 and I.4.1.

I.62.4 Please see responses to comments I.4.1 and O.12.49.

I.62.5 Please see response to comment O.12.10.

I.62.6 Copies of the Draft EIS were made available in several public libraries for public review as required under NEPA. 367 citizens were sent notices of the Draft EIS availability (NOA) and where they could be review the Draft EIS in libraries near their location. 331 copies of the Draft EIS were sent to agencies, organizations and individuals. Every individual who requested a copy of the Draft EIS was sent one. For further detail, please see response to comment O.12.190, I.4.1 and O.12.49.

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LETTER TO THE EDITOR

"WOULD BE NUCLEAR ENGINEER WHO HAD TROUBLES WITH POTHOLES AND JURIES/COURTS "

As one of the "pinko commie liberal chicom fellow traveler...swine" late (unlamented) Mayor Roger Hedgecock (or was it Hedgehog, as in Naval attack?) identified as"infiltrating among us, as we speak", I have been instructed by my Kommissar Felix Dzherzinsky of K.G.B. Central, Moscow and Beijing, acting under the expressed orders of Kamerades Stalin and Mao Tze Tung, to issue an official "pronouncimento" (i . e., contains many pronouns) to Roger (McCarthy?) Hedgecock 's divertissmento from, to quote his would-be supporter, "just the facts, Maam", i. e., Hedgecock, enough rhetoric already. Now, (as they say in the Courts as ex-officio Mayor Hedgecock should know all to well!), down to "cases":

- Village Voice, p. 40, August 21, 1978 - about nuclear leaks, referring to...
- Journal of Magnetism and Magnetic Materials, 7, 312 (1978) - about INCO-182/82 transition-weld "super"alloy accelerated overageing-embrittlement catastrophic failures (Hudson Generating Station gas-turbine, P. S. E. & G., Jersey City, New Jersey - early 1970's killing.maiming some 100 workers (this was the forensic study for the court in a circa $4 billion lawsuit, in which I predicted in abstract (last line) said consequences for the liquid-metal fast-breeder reactor (LMFBR) . . . fast-forward to Monju, Japan LMFBR "accident" (waiting to happen!).
- The Japan Times, December 10, 1995 - front-page headlines (in English), and several hundred articles since - 304 stainless-steel & INCO-182 (paper given at "Intl. Conf. on Magnetic Alloys & Oxides", The Technion, Israel (September, 1977 while employee of I. A. E. A.!) - censored in U.S., "Hear no evil, Speak no Evil, See no Evil" decidedly does NOT mean"DO no Evil" simply because "super"alloys do not read rhetoric; they simply do what they will do, the laws of physics/metallurgy, and it is our job, Mr. ex-Mayor, to "read THEM". THEY are what nuclear safety (or rather LACK thereof!) is about!
- R. Rollnick, The European, week ending January 14, 1993 - about INCO-182/82 and INCONEL-600 steam-leaks in pressurized water-reactor (PWR vessel heads an control-rod tubing, necessitating replacement of ALL EC PWR pressure-vessel heads at a cost of some (56/France + 44/Germany + 30/E.C. = 130 @ cost of som $130 billion to the E. C. because of radioactive-steam leaks of 1cub.meter/mi
- G. Lai, Met. Trans. A. I. M. E., 9A, 827 (1978) about HASTELLOY-X "super"all unbelievably-nearly-instantaneous thermal overageing-embrittlement(Fig.2/y-

I.63

I.63.1

in a 10^4 hour (= 1.5 years) in 10^2 hour = 4 days 1 week, i. e. in about 1 of its intended life!!! This work done right here at General Atomics while yo were Mayor, I believe - what other secrets do the "Blues Brothers" have in their vaults??? One can only wonder... And they want to build a fusion-reactor out of these verysame "super"alloys...!!! Why??? Planned obselescence causes more and more profits! (as anyone who has ever replaced a Mercedes headlight well knows!).

- J. R. Kattus, Code # - 4113, U. S. D. o. D. Aerospace Structural Materials Handbook, Battelle (1983) OFFICIAL-WARNING about THERMAL overageing-embrittlement of HASTELLOY-X IN FABRICATION as well as IN SERVICE at ambient-temperatures (in addition to any radiation-damage) - jet-engine "burn-cans"/combustio -chambers" are made of HASTELLOY-X as are any ALL both PWR and BWR fuel-bundl supports/"internals"; the Zircalloy-2/4 fuel-cladding is probably O.K. - its these HASTELLOY-X "super"alloy(S; GENERIC; ENDEMIC) where the problem(S) lie not only the embrittlement, but "sensitization" accelerated-corrosion/stress-corrosion which the OMB/USN/SAIC reports all acknowledge "can" cause radioactive corrosion-products "sludge" contamination, and already in many HAVE!!!
- Eugene P. Wigner, Journal of Applied Physics, 17, 857 (1946) - dire predic tion of same - Nobel Prize, Physics; Einstein's neighbor/friend who took the (in)famous "A-bomb letter" to Roosevelt; at Los Alamos under Groves/Oppenheime (1943-1946) as vice director - a recently-deceased genius who should have wor several more Nobel Prizes - one of the greatest physicists of all time, who i and was NEVER WRONG ABOUT ANYTHING!!!
- U. S. S. Thresher & U. S. S. Stingray sinkings because of hydrogen-embrittlement of hull-welds - a very analogous metallurgical/mechanical problem!!!
- R. Pollard, Union of Concerned Scientists Report "US Nuclear Power Plants Sh ing their AGE; Case Study: (BWR) (304 Stainless-Steel) Core-Shroud CRACKING" (September, 1995) & "NRC Report to Congress on "Abnormal" "Occurences" for O ober-December, 1994" detailing SUDDEN core-"internals" 304 stainless-steel (like Monju LMFBR) SEVERE-EMBRITTLEMENT in some 25 BWR's - 1/3 of all in U.S and EXACTLY as I predicted for INCO-182/82 transition-welds @ 17±5 years!!!
- Boston Globe/A.P. p. 25 (March 31, 1994) about March 30, 1994 French Nuclear submarine Emeraud: "Stream-'Leak" Kills Commander, Nine Crew..." - an INCO-18 transition-weld and probably 304 stainless-steel piping radioactive-steam

I.63.1

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EXPLOSION - EXACTLY as I investigated in the Hudson Generating Station steam-turbine EXPLOSION in early 1970's (when steam "leaks" ten people have plenty of time to exit that compartment, unless this "leak" happened ALL AT ONCE, which Messr. Webster's disctionary defines as an EXPLOSION!!!)-off Toulon France

In conclusion, Mr. ex-Mayor, I only hope that when you were mayor you managed the city's infra-structure better than you marshalled your facts in you diatribe. What journal was their source, the Army-McCarthy hearings minutes? Facts are what determines: science, engineering, SAFETY sir, not politics, inuendo, media hype, spin doctoring, P. R., showbiz, nor hatemongering!!!

I will be at the hearings, sir. Will you? If so, fair warning. Come with the Navy's best designers/metallurgists/nuclear-engineers/politicos, and come armed his time with FACTS!

I'd love to say more, but I've overstaved my welcome andlotted space. Anyway must urgently cable or phone my Kommissar at K. G. B. Central for more instructions. I'd go there, but the city's buses are too ramshakle and old, and there are too many potholes in the roads. Your legacy, sir? If so, which it seems, if you ever are assigned to stamp metal for license plates, please keep away from the nuclear reactor parts. p l e a s e! I built half a dozen nuclear P.W.R.core

How many did YOU??? (But NO roads; I'll leave LEFT potholes to YOU!!! Doctor E. Siegel: Dr. E. Siegel

- Ph. D. - Metallurgy - M. S. U.
- Westinghouse BETTIS Atomic Power Lab. (WAPD) - Sr. Metallurgist & Whistleblower
- Manager, Metallurgy and N. D. T. / N. D. E. / Q.-A./Q.-C., P. S. E. & G. (utility) and whistleblower! (see Ana Mayo article, Village Voice, p. 40, (8/21/78))
- International Nuclear Metallurgy/Materials/Fuels/N.D.T./N.D.T./Q.-A./Q.-C. Consultant, International Atomic Energy Agency (I.A.E.A.), Vienna, Austria & whistleblower!
- Manager, N. D. T. / N. D. E. / Q.-A./Q.-C., A. B. B. Combustion Engineering and whistleblower!

PURPOSEFUL FRAUD IN WIGNER'S-DISEASE THERMAL (& RADIATION)-OVERAGEING-EMBRITTLEMENT CATASTROPHIC-FAILURES HALVING OR WORSE EFFECTIVE-LIFE OF: NUCLEAR-REACTORS, FOSSIL-FUEL, JET/TURBINE-ENGINE,... POWER-PLANTS AND COMPONENTS PERPETRATED ON: RATEPAYERS, TAXPAYERS,... BY: PUBLIC-UTILITIES, "SUPER"ALLOY-SUPPLIERS/FABRICATORS, ARCHITECT-ENGINEERING DESIGN-FIRMS; POWER-PLANT DESIGNERS/FABRICATORS, AND THEIR "REGULATORS", NOW COMING-TRUE WITH A VENGENCE IN: E.C. (GERMANY, FRANCE), JAPAN(FUGUN, TOKAI, MONJU LMFBR,...); U.S. (G.-E. B.W.R.'s: 25 in 1998!!!);...

Dr. Edward Siegel, Ph.D.-MetALLURGY/Physics

Westin"kl"ouse APD/NES/ARD, Pittsburgh, Monroeville, Waltz-Mills, PA.(whistleblower (1974)); Public ("DIS")-Service Electric & Gas Co., Maplewood/Newark,N.J; (whistleblower-(1976)), International Atomic Energy Agency, Vienna, Austria(whistleblower-(1977)); InermAlloy-Technology Ltd., (T.A.T. & "T.A.T.L."), 90 Longwood Avenue, Brookline, MA. 02146; ~~1546 5th Avenue~~ 650 Park Street, San Diego, CA-92101;... tel: (619)270-5711

Wigner[1](THE; Jnl. Appl. Phys. 17, 857 (1946)-just-after some 4-years at Los Alamos-he who took the letter to Roosevelt-Nobel-Prizewinner) dire-warning prophetic/very early-on, is now coming-true with a vengence(!!!) as "Wigner's-disease" plaguing "super"alloys in high-temperature/chemical power-plants: nuclear-reactors, fossil-fuel, refineries/petrochemical, jet/gas-turbines, was P U R P O U S E F U L - F R A U D perpetrated upon: ratepayers, taxpayers,...by: "super"-alloy-suppliers (Haynes/Cabot/Purdential/Morgan, Lewis, Githers & Ahn, Inco,...) architect/engineer design-firms (Bechtel, Ebasco/Raytheon, United-Engineers/Raytheon, ...), power-plant designers/fabricators (G.-E., B. & W., C.-E./ABB, Westin"kl"ouse,...), and their "regulators (I.A.E.A., A.E.C., E.R.D.A., N.R.C.,...)!

Rediscovered by Siegel[2](Jnl. Mag. & Mag. Mtls. 7, 312 (1978)-for INCO-182/82 transition-weld "super"alloys-now coming true a la Rollnick[3](The European, Jan. 14, 1992-front-page headlines!-in whose abstract Japan, Monju LMFBR (Westin"kl"-ouse Clinch-River LMFBR recycled and perpetrated upon/defrauding Japan) nuclear-"accident"(waiting to happen!!!)(December, 8-10, 1995)), and Lai[4](Met. Trans.AIME 9A, 827(1978)-Fig.2-v-axis-literally instantaneous (10 hr/10 hr-test - 1% of "Life"!!!) of HASTELLOY-X (jet-engine combustion-chambers, nuclear-core internals,...) officially warned-against by D.o.E. in Kattus[5](Code #4112, DoD Aerospace Structural-Materials Handbook, Battelle (1983)),... it is "now" apparent (as it was to Wigner & the old A.E.C.(1946), P.S.E.& G. & any/all other public-utilities (H. Richards (1950's-1060's) & H. Obermayer, & E. Siegel(1970's), PSE& G & NRC Internal Repts.(1973-1974),... that "Wigner's-Disease" in both G E N E R - I C and "now" E N D E M I C literaly any/every-where!!!

Most recent "super"alloy is 304/304L-"stainless"-steel overageing-embrittlement thermal/radiation in Monju, Japan LMFBR secondary coolant-loop and 25 U.S./G.-E. core-shrouds, with sudden-embrittlement leading to imminent catastrophic-failure a la Pollard[6](U.C.R. Rept(19950, N.R.C. Rept. to Congress(1995);...) now threatening long-term expensive forced-outage shutdowns/reairs/maintainance of some 25 U.S. B.W.R.'s.

This "planned-obsolescence" was P U R P O S E F U L F R A U D, as concluded by Klaus Stadie (Nucl.-E.; first Direktor-General, Euratom) in a new book entitled "The Death/Demise of Nuclear-Power". So, who do these P E R P E T R A T O R - S peddle their lies and poisons to now that the West (US, E.C.) has caught on to their deadly "game". Just like tobacco producers, they peddle their poison /F R A U D to third-world and mostly Asian countries, mainly Japan and the P.R.C both latter no slouches in perpetrating frauds against their very-own ratepayers, taxpayers, and citizens!!!

Military nuclear-submarine dangers lurk, as witness the Emeraud French SSBN/attack nuclear-submarine nuclear-"accident" waiting to happen!!!, an INCO-182/82 transition-weld explosion (killing captain & 9 crew) exactky like P.S.E.& G. Hudson Generating Station fossil-fuel steam-turbine explosion (early '70's) killing/maiming so many!!!(Boston Globe, P. 25 (March 31, 1994))

Military/commercial jet-engines(G.-E. CF-6 recall: Intl. Herald Tribune, ; Aviation Week(p. 31 (Sept. 2, 1985); N.Y. Times(Sept. 25, 1985);, commercial gas turbine massive G.-E. recall (The Wall Street Jnl.(front-page, May 25, 1996));...

This is multi-industry (perhaps several dozens) P U R P O S E F U L F R A U D upon: ratepayers, taxpayers, citizens, regulatory-bodies,... with extensive scientific/metallurgy/engineering/"accidents' waiting to happen/newspaper-headlines to back up this charge of W I L L F U L/P U R P O S E F U L F R A U D by how upon Y O U R/the "regulators" shoulders. Such is the mantle they leave YOU! by abovementioned corporate/government-agency/U.N.-agency P E R P E T R A T O R S

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IN SAN DIEGO

. Edward Siegel, 1111 Hornblende/Suite 2, San Diego, CA. 92109 /(619) 270-5111
Ph.D./Metallurgy/M.S.U. (1970); M.S./Physics/U. of Michigan (1969); attended New York U.(1966-1968)/Physics; U. of Pennsylvania/(1965-1966)/Materials Science/Metallurgy - both graduate school/ B.S./Physics/C.C.N.Y.(with Colin Powell (1965) / attended Colorado School of Mines (1960-1961)/Metallurgy & Geophysics/Mineralogy
WHISTLEBLOWER: Westinghouse Bettis WAPD (designer & manufacturer of Pressurezed Water Reactors (PWR's) for Naval Reactors Program (1974); Public Service Electric & Gas Co. (Mgr./Metallurgy & N.D.T./E.)-N.J. Nuclear Utility (1976); International Atomic Energy Agency (IAEA)/ Intl. Nuclear Materials Consultant (1977);ABB C-E. Mgr. of N.D.T./E. (late 1970's-...)

As detailed sequentially in accompanying "letter to the editor" and attachments, a succinct summary of my technical objections to any/all (not just the Stennis!) home-porting of any/all nuclear-reactor powered ships in San Diego is:

Preliminaries:

I.63.3

I.63.4

I.63.5

- Navy's use of former mayor (and convicted felon) Hedgecock to impune the loyalty of any/all citizens opposed by "baiting the 'commies'..."
- Navy's use of "agent provocateurs" at anti-Stennis rally during its arrival
- Navy's, with Jewish: most probably new Secretary Danzig, half-Jewish Defence Secretary Cohen, and natioal security advisor Berger, "accidental" scheduling of initial two hearings to coincide with holiest Jewish holiday, Yom Kippur (Day of Atonement), September 29th and 30th,1998. (this latter constitutes a clearly illegal anti-Semitic civil-rights violation with use of government funds by government employees, and is currently under investigation by F.B.I. for criminal civil rights (and other Federal laws) violation. The excuse that it wasan accident because of non-inclusion on U.S. Navy calendars is nonsense in view of the Navy and Executive branch/Cabinet preponderance of Jewish senior officials!!!

Technicalities:

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I.63.7

I.63.8

- geographical: home porting of most especially Stennis CVN some 1,500 miles far south of Bremerton, Washington significantly lengthens steaming time to Asia or Russian coasts, whose minimal "angle of attack" times are only on great-circle routes (followed by commercial airlines and ICBM's!). From San Diego, one could quickly deploy to defend only: central American and South American West Coasts, and Tahiti
- security: proximity to relatively lawless Mexico and relative lack of security because of proximity to: downtown San Diego, Point Loma area, and Coronadó makes nuclear-ships prime terrorist targets for short-range anti-ship missiles. Terrorists can get too close from too many places too easily. More security is a must!
- FRAUD: as supported preliminarily by attached documents, WESTINGHOUSE (now "CBS Enterainment")has for some fourty years PURPOSELY DEFRAUDED the U. S. Navy (as well as commercial customers) in conjunction with: General Electric, ABB/Combustion Engineering, Babcock & Wilcox, most architecht-engineer firms, originating from alloy suppliers: International Nickel, Haynes International/Cabot Corp/Prudential Insurance/Morgan, Louis, Githers & Ahn, along with one Asphahani(subsequent owners) by designing, fabricating, constructing, PWR's, most especially U. S. Navy PWR's, using purposely "thermal leading to mechanical" (TLTM)-unstable-instability "Wigner's-disease" overageing-embrittlement spinodal-decomposition ccatastrophic-failure prone nickel-based and iron-based ("stainless"-steels) so-called "super"alloys: INCO-182/82 transition-weld (rod) filler-alloys (welding pressure-vessels (C,Mn ferritic-steels) to austenitic piping (304/304L, 312, 316,.. "stainless"-steels and nickel-based possibly Inconel-600,... This is/was always "planned obselescence", to refit/supply more parts at greater profits, as for HASTELLOY-X fuel-bundle array supports/"core internals" (but as well any/all (except for Rolls Royce, which removed these garbage"super"alloys decades ago!) military and commercial General-Electric and/or Pratt & Whitney/United Technologies jet-engine combustion-chambers ("burn cans") which explode frequently due to their inherent intrinsic overageing-embrittlement (as Lal first published-see attachments and Kattus officially warned about for the whole D.O.D.-see attachments.This is what severely shortens nuclear-reactor core lifetimes, with purposeful planned-obselencence "super"alloys components to increase sales of component replacements, retrofittings, and too early core decommishionings, and causes SIGNIFICANTLY ENHANCED INCREASED PROBABILITY OF NUCLEAR LEAKS, IF NOT OUTRIGHT NUCLEAR-"ACCIDENTS" (WAITING TO HAPPEN!!!) due to "POOR" COMPONENT ALLOYS!

I.63

ast especially Westinghouse, but as well G.-E.'s, replacement parts and core replacement/decommissioning businesses!!!) ENDEMIC, "super"alloy Wigner's-disease Ostwald-ripening spinodal-decomposition "thermal-leading-to-mechanical" (TLTM)-INstability OVERageing-embrittlement and their concomitant catastrophic-failures have a simple analogy.

They are like female senior citizen's OSTEOPOROSIS, a true (Winger's)-DISEASE not to be denied, like a cancer, eating away at the (most especially Westinghouse pressurized-water reactors (PWR's) (but as well in G.-E./KAPL BWR's), which, because of its (not so) "long"-time chronic progression, can and will become acute in catastrophic-failures, as it has in so many "super"alloy applications already. And this progression, with/in time, can only accelerate. This is whyit is technically called not just "ageing", but OVERageing!!!

In conclusion, let me offer the analogy to make the point:

- the U. S. Navy (and commercial, as well) is like the JOCKEY in a horse race. hey simply drive the horse/ship, versus
- I am like the DOCTOR, the veterinarian specializing in horse bone diseases!

The Navy can drive their horses/nuclear ships all they want, so bravely, with so much "braggadocio" and machoness, but, when the doctor diagnoses thet the horses bones have osteoporosis/I diagnose "super"alloy TLTM-INstability, it would be a foolishly macho jockey, and a soon to be poor horse owner, who would insist on continuing to "ride like the wind" risking the horses limb and life without a thorough diagnosis, and a consultation/hearing to discuss the issue!!!

Of course, the Navy is not quite like the owner; it won't go broke simply because the Navy can and will not foot the bill. They have an infinite "sugar daddy", the ripped off taxpater citizens, who have been PURPOSELY defrauded for some four to five decades, by WESTINGHOSE (for PWR's) and G.-E. (for BWR's)!!! So, thhe Navy, rather than admitting to the even possibility, muchless high probability of reactor "super"alloy component/systems GENERIC "now" ENEMIC metallurgy problems, simply takes the infamous out of one who has an infinite source of taxpayer/citizen funds to repair their foolish mistakes of many decades, to quote one (jnfamous) Alfred E. Newman, "What, me worry??? For the Navy to seriously consider, muchless air its dirty linen in public at substantive hearings that it who by definition "can do 'no' wrong!" ;(Why? Because "we are us"!) is to bury one's head in the sand and hope the bad spirits pass them by. But these bad spirits simply will not let the Navy go. After all, these GENERIC "now" ENDEMIC overageing-embrittling "super"alloys can and will follow the laws of physics and chemistry embodied in their very own metallurgy. And they do not read the Navy's public relations media hype spin doctoring marketing media blitz. They do not even read the metallurgy scientific literature. They will do what they will do when we want, and it is not up to them to read us. We have to read and study and learn from them. This has been done since the early 1970's in the very least. So how come it is "news" to the Navy? And, if not, why is the Navy not more forthcoming about it, to the public, and most especially to duely elected congressional committees, representatives and senators?? Could it be that this self-deluding Navy organization and Naval Reactors Office/Nuclear Navy:

(a) either won't tell (the "cover your _ _ _ at any costs option) (especially since financial costs will be further loaded onto the taxpayers/citizens),OR
(b) its Navy macho technical incompetance cannot fathom such technicalities, hoping to rely only upon these (verysame PURPOSELY defrauding) contractors: BWR's G.-E./KAPL and most seriously PWR's/WAPD WESTINGHOUSE!!! (after all, the moto over the Electric Chair is "You can be 'SURE' if its WESTINGHOUSE!!!". Here, in this context, what you/the Navy/the paying taxpayer/citizen CAN be 'SURE' of is: PREmature component failures/replacements decommissionings/refirrings/... of nuclear-cores, with continuing on-going (ad infinitum; ad nauseum!!!) taxpayer/citizen ever mounting bills, even if there are never "leaks" nor catastrophic nuclear "accidents" (waiting to happen!!!). When will the Navy SUE WESTINGHOUSE (& G.-E.) to recover these HUGE PURPOSEFUL FRAUD COSTS???

If the Navy wants, to echo Congressman Filner's testimony, hold TWO-WAY NON PR-media hype/blitz marketing HEARINGS rather than jusrt one-way diatribes, wit BOTH SEMIOR Navy officials (their Secretary, and Secretary Cohen), AND their a /or their contractor's (G.-E./KAPL and WESTINGHOUSE/WAPD) metallurgy/designer technical experts (along with the expected DoE National Laboratory usual publu A N D the only trustworthy metallurgists working for the government, those of U Nofased/I Ncorruptable N. I. S. T.. ONLY THEN can SUBSTANTIVE issues be aire

I.63.8

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SAN FRANCISCO, CA. [redacted]
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M.S. - UNIV. OF MICHIGAN - PHYSICS (ATTENDED: NEW YORK UNIV.; UNIV. OF PENNSYLVANIA)
B.S. - C.C.N.Y. - PHYSICS

EXPERIENCE:

- STATIC SYNERGETICS RESEARCH LTD., SAN FRANCISCO, CA. - FOUNDER & INVENTOR/DEVELOPER OF STATIC SYNERGETICS. UNIVERSALITY-PRINCIPLE REEXPRESSION THREE LAWS OF THERMODYNAMICS MAPPING PATTERN-RECOGNITION EQUIVALENC TO SIGNAL-PROCESSING TO EXPLAIN UNIVERSAL FUNCTIONS: 1/f NOISE. 1/f SUSCEPTIBILITIES. CRITERION FOR-ANDERSON LOCALIZATION & MULTI-LEVEL SYSTEM (APPLICATIONS: MATERIALS PROCESSING REAL-TIME O.C./O.A. TO OPTI IZE YIELDS. CAM. CAD. CRYPTOGRAPHY. FRACTALS. HOW THEY WORK: WHY THEY WOF PROC. ELECTROCHEM. SOC. 83.8.497 (1983): TEST & MEAS. WORLD EXPO. SAN JOSE (1983): J. NONXL. SOL. 40.453 (1980): INTL. CONF. LATT. DYNAM., PARIS (1977): J. PHYS. CHEM. LIQ. (1975) & (1976) - 8 PAPERS/CONTEMP. PHYS. (1986?)
- SILICON VALLEY CONSULTANTS, CA. - MATERIALS SCIENCE/SOLID STATE PHYSICS/CONSULTING (SEMICONDUCTORS. FIBER-OPTICS. MAGNETIC MEMORY....)
- NATIONAL RESEARCH COUNCIL, SAO PAULO, BRAZIL - VISITING RESEARCH PHYSICIST DEVELOPMENT OF STATIC SYNERGETICS FOR DISORDERED SYSTEMS: GLASSES. L UIDS. PLASMAS (INHOMOGENEOUS/STRIATED). DEFECTED XLS., MAGNETS. POWDERS SLUSHES (FERROFLUIDS). COMPOSITES. POLYMERS. REF: APS PLASMA DIV. MTG., L (1 83); IEEE CONF. ON PLASMA SCI., S.D. (1983): J. MAG. MAG. MTLS. - SERIES PAPERS (1977), (1978)... BRILLOUIN/LANDAU SYMMETRY-BREAKING DOMINANCE
- QUEEN MARY COLLEGE, UNIVERSITY OF LONDON, U.K. - VISITING RESEARCH PHYSICIST DEVELOPMENT OF STATIC SYNERGETICS FOR DISORDERED SYSTEMS: POWDERS (I ERSTELLAR GRAINS. COMPOSITES). MAGNETS (SPIN GLASSES. METALLIC GLASSE! I.R., U.V. & VISIBLE OPTICAL PROPERTY FUNCTIONS COMPUTATIONS: MICRO MILLIMETER WAVE & R.F. TRANSMISSION. REFLECTION. REFRACTION. EXTINCTI
- INTERNATIONAL ATOMIC ENERGY AGENCY, INDONESIA, VIENNA, AUSTRIA & ICTP TRIE: RADIATION DAMAGE DISORDER/DEFECTS IN CERAMICS. METALS. ALLOYS. POLYMI N.D.T. (I.R. IMAGING. ACOUSTIC EMISSION. ULTRASONIC SCATTERING....) ON SOLID & LIQUIDS. AND PLASMA PHYSICS WAVE PROPAGATION/SCATTERING.
- MOLECULAR ENERGY RESEARCH CO., WESTWOOD, N.J. - ELECTROCHEMISTRY/PHYSICAL C
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- WESTINGHOUSE ATOMIC POWER DIV., PITTSBURGH, PA. - SENIOR MATERIALS SCIENTI RADIATION DAMAGE. NDT. MECHANICAL PLASTICITY. SOLITONS. DISLOC. THY.
- GENERAL MOTORS TECHNICAL CENTER & FORD MOTOR CO. SCIENTIFIC LAB., MI. - SR LIQUIDS. POLYMERS. CERAMICS (CARBIDES). LASERS. OPTICAL. FOOD. SHOCK WAVI

I63

DR. EDWARD SIEGEL

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Now French & Military Nuclear-Power-Plants!!! Boston Globe p. 25 Thu 3/31/94

Olivert's

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...L STARTS THURSDAY 3/31

SHKOSH B'GOSH
GENUINE ARTICLE SINCE 1895

Steam leak kills commander, 9 others aboard a French nuclear submarine

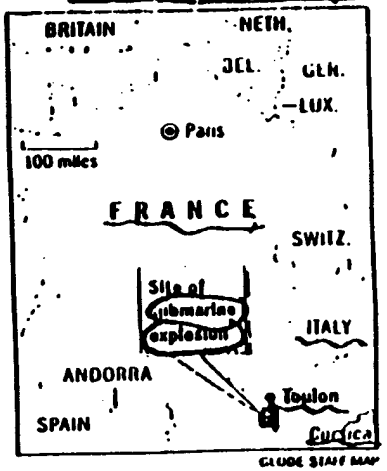
184 lines 156 B 359-1106 ASSOCIATED PRESS 1279 col 1

TOULON – Superheated steam leaked inside the turbine room of a submerged French nuclear submarine yesterday, killing the commander and nine other sailors during a naval exercise in the Mediterranean.

The Emeraude surfaced and headed to its base at Toulon using diesel and battery power, officials said.

The accident did not affect the vessel's reactor and "in no way puts into question either the nuclear security of the vessel or the environment," the Defense Ministry said.

A leak in a pipe "filled the turbo-generating room with steam," burning the victims or asphyxiating them, Rear Adm. Philippe Roy said. He said other compartments, including the one housing the sub's nuclear reactor, were not affected.



GLOBE STAFF MAP

There was no immediate word on what caused the leak on the 6-year-old submarine, Roy said.

The Emeraude, which normally has a crew of 60, was training with other French navy vessels between the island of Corsica and Toulon. In service since September 1988, it can be armed with torpedoes, antiship Exocet missiles and mines. It carries no nuclear weapons.

One of six nuclear attack submarines based at Toulon, the Emeraude is powered by a pressurized water-cooled nuclear reactor, which heats water to produce steam to drive two turbine generators. The generators produce electricity that powers the ship's propeller and runs its internal systems.

The accident was the second involving a nuclear-powered submarine from Toulon in eight months.

The attack sub Rubis hit an oil tanker while surfacing during anti-collision maneuvers off Toulon last July 19. No one was injured, but the submarine sustained serious damage to its bow, which houses sensitive sonar equipment.

Toulon is 400 miles southeast of Paris on the Mediterranean.

Over-Ascending Alb Metallurgy Failure is 100 T Cobalt with Tiny Inserts ... 4101 Reservoir Rd N.W., D.C

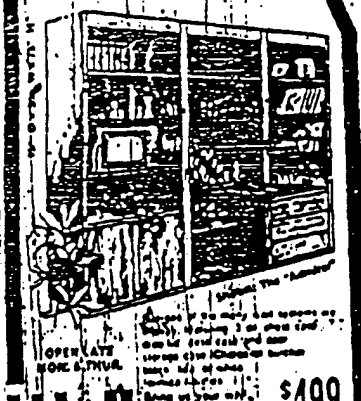
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VILLAGE VOICE, AUGUST 21, 1978 p. 40

Voice August 21 1978

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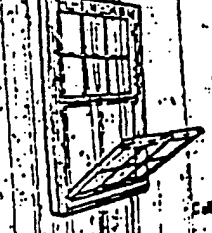
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GEIGER COUNTER

By Anna Mayo

If Leaks Could Kill

At Seabrook, latest Palo, Alabama, a whole nuclear reactor contains hundreds of miles of convoluted pipes, much of it stuck together with INCO 82 and INCO 182, two miracles of American know-how brought forth by Huntington Alloy Products, a division of International Nickel. A gadfly fabrication investigates early after the coal as dangerously flammable fuel cool, but in pushing the service life the coolant water itself becomes dangerously radioactive. Leaking it can kill. So it is that INCO 82 and INCO 182 are two of the world's most crucial alloys.

The Public Service Electric & Gas Company is a New Jersey utility with four nuclear reactors either operating or under construction. Its nuclear program has been plagued from the outset by labor disputes, environmental protests, delays in permits, and federally mandated design changes. In September of 1976, P.S.E.&G. was among the utilities singled out as a poor investment risk by the respected, century-old New York brokerage firm of Jessup & Lamont. P.S.E.&G. boasts one of the best utility energy-research laboratories in the country. In the late spring of 1975, Dr. Edward Siegel, then the lab's chief metallurgist, says that he was assigned and funded to carry out an investigation of possible shrinkage and cracking in INCO 82/182 welds. Siegel and a team of technicians went after the alloy with every arcane, precise technique in the book: metallography, chemical analysis, Kirkdene microstructure (Rockwell A scale indenter), scanning electron microscopy, X-ray line and area scan non-dispersive local elemental mapping, X-ray diffraction, Mossbauer spectroscopy, and tensile testing—you name it.

By the winter of 1976, Siegel's research had led him to suspect that INCO 82/182 might not stand the heat in nuclear plants. As was natural, he discussed his doubts with researchers from other utilities whom he met at industry gatherings and as a result he remembers getting a lot of calls asking for more information. Suddenly, he says, the energy lab supervisors called him in and ordered to stop talking about his work. The censorship attempt infuriated Siegel. Utilities, he says, are not competitive and normally share technical information. So why the secrecy? A P.S.E.&G. higher-up assured him that there had been a misunderstanding; that he was free, as before, to exchange ideas, just as long as he kept a record of communications with persons outside the company. "Just a routine means of coordinating information."

In September of 1976, he recalls, the lab supervisors accused him of falsifying his expense account. Siegel, outraged, says that he challenged the company to bring criminal charges against him so that the matter could be settled in court, but, he says, he was fired without formal charges. He went round to pick up his books, papers, and personal effects, but found his office padlocked. Anthony Lawi, an engineer who has since left P.S.E.&G. to start his own company, reports that he saw company personnel ransack Siegel's belongings before returning them. Siegel claims further that a lab technician told him that the company had removed all INCO samples and other experimental materials from the lab, announced that the project was terminated, and pledged him not to discuss it.

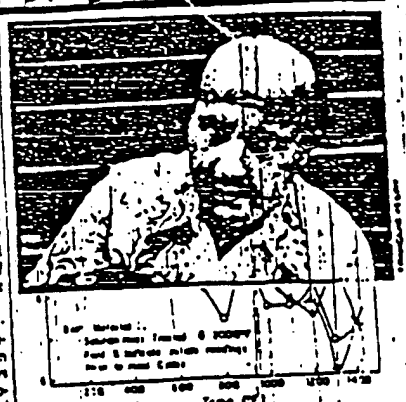
In 1976, Siegel says he was only fitfully aware of the controversy raging over the use of nuclear energy. He had had no contact with the citizens who were protesting against P.S.E.&G.'s nuclear commitment. Siegel had found the communards of his diminal history, but had put it down to Left-Semitism. (The company had refused to give him Rosh Hashanah off or to let him sit shiva following his mother's funeral.) Then, he says, "I started to follow Geiger Counter's Chronicles of Persecuted Scientists and began to suspect that I might be a victim of the same tactics." Eventually he asked *The Voice* to raise the question of why P.S.E.&G. had got rid of him. Was his firing part of an INCO coverup?

Industry scientists steadily maintain that there is nothing to cover up, since INCO never thickens and cracks until it reaches temperatures of 1000 degrees Fahrenheit. Cracking is a problem in fossil-fuel plants that operate at that heat, they say, but not in nuclear reactors, where the water temperature hovers between 500 and 600 degrees.

Siegel, however, claims—and this is the crux of his argument—that water, if subjected to thermal transients—sudden jumps to 1000 degrees—like says he has reason to suspect that transients lasting one to three hours, have a cumulative weakening effect on INCO.

Such temperament leaks are impossible, says industry. According to Joel Sutsuma, public information officer of the Chicago office of the U.S. Nuclear Regulatory Commission, in nuclear reactor pipes, temperature depends on water pressure. When the rushing water reaches 1240 pounds pressure per square inch, relief valves open, automatically reducing the pressure—and the heat.

Geiger Counter consulted with Cyril Misner, who in 1976 quit his job as a managing engineer of the General Electric Company to work with the environmental movement. Misner is



Temp (°F)

Metallurgist Edward Siegel, Ph.D., with section of graph illustrating properties of INCO 182 from Siegel's paper on alloys published this year in the *Journal of Magnetism and Magnetic Materials*. (You can look it up.)

said that thermal transients can occur if the means that results from water boiling when pressure is reduced heats up as it passes through the fuel core. P.S.E.&G., nobly pretending that it had to protect Siegel's privacy—a favor Siegel hasn't asked for—refused any comment on his association with the company or the reasons for his departure.

Siegel, however, had given me the names of two scientists whom he respected, and who, he said, had encouraged his line of research. He thought of them as friends. Some friends. The first, a senior researcher at another institution, who wished to remain anonymous, accused *The Voice* of trying to make trouble. "That man is a disgruntled employee!" he shouted. "Took a trip around the world and returned in an extremely unorthodox manner! His report was very poorly based, ridiculous!"

Siegel's other "friend," a P.S.E.&G. engineer who also declined to be identified, gave a different account. "You know what he is? He's one of these people who believe in science," he snarled. Thinks you can find out something in a laboratory. Well, we know the proof of the pudding is in the eating. We have no INCO problems in the actual operating plants. No problems at all."

No Problems

In late June, out in Palo, Iowa, the Iowa Electric Company had to shut down and remove the fuel from its Duane Arnold nuclear power plant in order to make emergency repairs. It must have been bad in Palo. Iowa Electric would not remove fuel lightly, for environmentally (and economically) speaking, removal is no picnic. After a reactor has been operating for awhile, the fuel decays to the point where a portion of it is plutonium and it can be handled only by remote-control cranes which, like their human masters, can slip and drop their dangerous loads. And there is the risk of stashing the fuel in Iowa's storage pool while repairs are going on. Like storage space at other reactors, Iowa Electric's fuel pool is already filled beyond original design specifications, there being no national radioactive waste-disposal facility to receive spent fuel. The problem with crowding a fuel pool is that, if fuel elements get too close to one another, you get a chain reaction that can result in a disaster-movie release of radioactivity.

Fuel removal is astronomically expensive. The staff of the Iowa State Congregent Commission, which regulates Iowa Electric's rates, has made a tentative estimate of $20 million for fuel removal. "Since they don't know what's wrong, we can't even begin to estimate what the repair costs are going to be," said Arthur Zahller, a staff engineer of the commission. But $20 million is a lot of money in Iowa. Zahller added firmly that the commission will be holding hearings August 31 to determine whether the plant breakdown is "the result of an error or an imprudent act."

Like relying on defective materials.

The Duane Arnold fuel had to be removed when leakage in the plant reached an alarming level of four gallons of radioactive water per minute. The leakage had been determined to have been caused by as-yet-unexplained failures in Inconel 600 fittings. The NRC suspects that the problems with Inconel 600 (another nickel alloy) are unrelated to possible INCO 82/182 failures. Siegel wonders whether undetected INCO 182/82 cracking may be affecting the Inconel 600 material. (International Nickel confirms that 600 is always welded with 182 and 82.) When I told Siegel about the Duane Arnold shutdown, he remembered that in September of 1975, one of those once-friendly lab aides had mentioned to a scientific meeting that his work might have implications for failures in other nickel alloys, including Inconel 600 as well. Can Siegel have found the nuclear industry's Achilles heel? You can't make trouble any other than you can make it. They both have to be there to begin with.

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Predicted (1974–1976)
① the Metallurgy Achilles'-Band
② the Magnetic N.D.T. Q-A. (rejection)
③ the Alloy Rejuvenation Heat Treatment Q-C. (enhancement ?)
Maintain Code

IR&D Conf = Magnetic Alloy & Oxides (= CMAO) Please Return
The Technion Haifa, Israel (1977)

Journal of Magnetism and Magnetic Materials 7 (1978) 312–316
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PARAMAGNETIC–FERROMAGNETIC TRANSITION IN AGEING PRECIPITATION HARDENED NICKEL-IRON SOLID SOLUTION ALLOYS

E. SIEGEL*
Energy Laboratory Public Service Electric and Gas Company, Westinghouse Atomic Power Div., Pittsburgh (1976) (1974) (1977)
Westinghouse Atomic Power Div., Pittsburgh
I.A.E.A., Vienna, Austria.

Initially paramagnetic FCC Ni based alloys are shown to transform to ferromagnetic FCC alloys upon aging. This magnetic transformation is accompanied via NbC, TiC and mixed (Nb, Ti)C precipitation in the matrix caused by a drastic change of the Curie temperature of the residual Ni alloy matrix through room temperature. These reversible transformations cause severe changes in the mechanical properties of the Ni alloy viz. hardness and fracture toughness. This is of major importance since these alloys, identified as INCO 82 and INCO 182, form the weldment transition weld metal in most nuclear and fossil fuel plants constructed since 1960. Most refineries and the LMFBR, the former having known enhanced premature weld failure via this mechanism.

(1973–77) @ WNRE/WNS WIND MANJU[12] PREDICTION
SIEGEL

1. Introduction

Initially paramagnetic FCC Ni based alloys, identified in welding parlances as INCO 182 and INCO 82, transform to a ferr[illegible] FCC alloy phase in their as cast form upo[illegible]gein. This magnetic transformation is accompanied by a drastic change in their mechanical properties: hardness, fracture toughness, tensile strength (ultimate), and yield strength (elastic–plastic limit yield point).

Such alloys are experimentally important because they are the major transition weld metal between ferritic BCC or BCT (martensitic) steels and FCC stainless steels in fossil fuel and nuclear electric generating stations, as well as in petrochemical refineries, synthetic natural gas and coal gasification and liquefaction, pipes, and other chemical plant components. Therefore, magnetic indication of their mechanical age (age hardening) unsuitability in service is an extremely valuable tool for nondestructive testing of such transition welds in steam piping, and for studying experimentally, the age hardening (precipitation hardening) process and dynamics (kinetics) with an eye to possible alloy stabilization via addition of alloying elements to prevent such catastrophic age hardening or to possible rectification by in situ solution treatment on welds or increasing ambient temperatures artificially to bring the alloy above the age hardening thermal range, i.e. to dissolve the precipitates as fast as they form or to prevent their formation entirely.

2. Alloy ageing experiments

The INCO 182 alloy, of initial (and final) composition (in wt%):

Ni = 65.23; C = 0.165; Co = 0.04
Fe = 8.62; Nb = 1.93; Ti = 0.83 ← The Culprits
Cr = 14.03; Si = 1.02;
Mn = 7.55;

was age hardened at temperatures of 700°F to 1400°F (with additional solution treatment at temperatures of 2000°F down to 1400°F for times ranging from 2 hr to 15 min) for times ranging from 1.5 min to several months in order to simulate in-service aging nominally 1025°F for periods up to 105,000 hr (10 years) by accelerated ageing. In addition, the as cast alloy was furnace aged for 17 years at about 1100°F continually, with no thermal cycling and no ambient service and with no applied stress as opposed to aged alloy in service in piping welds. This latter fur-

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PARAMAGNETIC–FERROMAGNETIC TRANSITION IN AGEING PRECIPITATION-HARDENED NICKEL-IRON SOLID SOLUTION ALLOYS

E. SIEGEL *
Energy Laboratory Public Service Electric and Gas Company Maplewood, N.J. USA

Initially paramagnetic FCC Ni based alloys are shown to transform to ferromagnetic FCC alloys upon ageing. This magnetic transformation is accomplished via NbC, TiC and mixed (Nb, Ti)C precipitation in regular arrays, accompanied by a concommitant increase of the Curie temperature of the residual Ni alloy matrix through room temperature. These regular arrays cause severe changes in the mechanical properties of the Ni alloy viz hardness and fracture toughness. This is of major importance since these alloys, identified as INCO 82 and INCO 182, form the dominant transition weld metal in most nuclear and fossil fuel plants constructed since 1960, most refineries and the LMFBR; the former having shown enhanced premature weld failure via this mechanism.

1. Introduction

Initially paramagnetic FCC Ni based alloys, identified in welding guidances as INCO 182 and INCO 82, transform to a ferromagnetic FCC alloy phase in their as cast form upon ageing. This magnetic transformation is accompanied by a drastic change in their mechanical properties: hardness, fracture toughness, tensile strength (ultimate), and yield strength (elastic–plastic limit yield point).

Such alloys are experimentally important because they are the major transition weld metal between ferritic BCC or BCT (martensitic) steels and FCC stainless steels, in fossel fuel and nuclear electric generating stations, as well as in petrochemical refineries, synthetic natural gas and coal gassification and liquefaction plants, and other chemical plants in general. This magnetic indication of their mechanical ageing (age hardening) instability in service is an extremely valuable tool for non-destructive testing of such transition welds in steam piping, and for studying experimentally, the age hardening (precipitation hardening) proceeds and dynamics (kinetics) with an eye to possible alloy stabilization via addition of alloying elements to prevent such catatrophic age hardening or to possible rectification by in situ solution treatment on welds or increasing ambient temperatures artificially to bring the alloy above the age hardening thermal range, i.e. to dissolve the precipitates as fast as they form or to prevent their formation entirely.

2. Alloy ageing experiments

The INCO 182 alloy, of initial (and final) composition (in wt%):

Ni = 65.23;	C = 0.165;	Co = 0.0
Fe = 8.62;	Nb = 1.93;	
Cr = 14.03;	Ti = 0.81;	
Mn = 7.55;	Si = 1.01;	

was age hardened at temperatures of 700°F to 1400°F (with additional solution treatment at temperatures of 2000°F down to 1400°F for times ranging from 2 hr to 15 min) for times ranging from 15 min to several months in order to simulate in service use at nominally 1026°F for periods up to 105,000 hr (10 years) by accelerated ageing. In addition, the as cast alloy was furnace aged for 17 years at about 1100°F continually, with no thermal cycling as exists in ambient service and with no applied stress as opposed to aged alloy in service in piping welds. This latter furnace ageing produced exactly the same ageing and embrittlement properties and effects, ruling out change in chemical composition or applied stress at the outset from affecting the age hardening-precipitation-hardening mechanism or rate kinetics.

The INCO 182 alloy, with a supposed in weld lifetime of 30–40 years at ambient in plant temperatures and stresses, severely age hardened in service and during artificial simulation furnace ageing, in times as short as 7–10 years causing (in the plant welds) extensive mechanical cracking of main steam leads (stainless steel) to (ferritic steel flanged) turbine housings (at nominally 1026°F and radial stress of 2000 Psi steam pressure) in electric generating stations in New Jersey and England [1]. In addition, similar embrittlement has been seen in superheater tube (stainless steel)–steam header (ferritic steel) welds in France, Italy, Germany, Holland and the USSR as well as at numerous US utilities [1]. The possibility exists, that in addition to its severe age hardening process, these alloys may be of the INVAR class [2] exhibiting INVAR anomalies in thermal expansion coefficient and elastic constants (and bulk and shear moduli), so that repeated thermal cycling (about twice per 24 hour period) may induce additional large stress increments upon the welds in service to help nucleate and propagate the brittle fracture cracks observed.

3. Alloy experimental investigation techniques

The INCO 182 alloy was investigated by a plethora of complimentary experimental techniques. These were: metallography, chemical analysis, hardness measurements (Rockwell A scale indenter) relative magnetization, electrical resistivity, scanning electron microscopy, X-ray line and area scan non-dispersive mode elemental mapping [3], X-ray diffraction [4], Mössbauer spectroscopy [5], and hot tensile testing [6]. A control sample was aged artificially in an argon atmosphere for 105,000 hr. and all measurements on the control versus the actual weld aged alloy were quantitatively identical. Thus, one could repeat the purely thermal effect of age hardening via precipitation hardening to simulate the ambient in-service conditions the alloy experienced in the generating station environment.

4. Experimental results of age hardening and solut. softening heat treatments

Scanning electron microscopy, X-ray line and area elemental scans and metallography, all revealed that in the unaged (as cast) alloy, initially FCC and paramagnetic, randomly distributed and small (but few) (Nb, Ti) C, NbC and TiC precipitates grew within the alloy matrix grains and along the alloy matrix grain boundaries without preference. Upon the age hardening, these carbide precipitates grew in size, increased in density and, most important, aligned in rows, producing a structure reminiscent of a Bitter pattern of magnetic domain boundaries, without preference to grain boundaries, which naturally just intersected the aligned precipitate rows (figs. 1 and 2).

Hardness measurements indicate that the non-aligned precipitate, unaged (as cast) alloy increased in hardness upon ageing from $R_a = 40$ (quite ductile) to $R_a = 60$–65 (loss of ductility) due to aligned precipitate formation and growth (figs. 5, 6). Concommitantly, the relative magnetization increases upon ageing by a factor of 25–27 times (over one order of magnitude) during precipitate alignment and growth; the samples develop a very strong (ferro) magnetic moment, easily discernable with a hand magnet. The electrical resistivity after a series of ageing treatments in argon, at temperatures ranging from 600 to 1400°F, for times of a few hours, developed a classical ageing peak in the resistivity versus ageing temperature (iso-

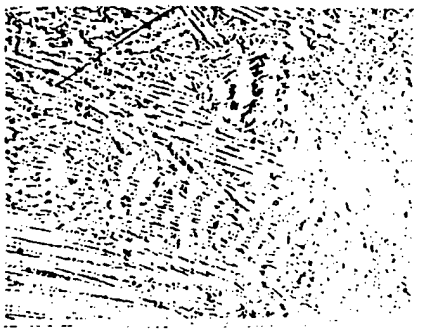


Fig. 1. Age hardened INCO 182 alloy (80×) showing linear chains of (Ti, Nb)C precipitates.

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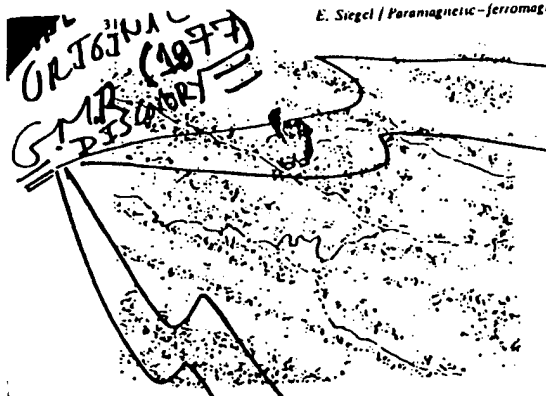


Fig. 2. Age hardened INCO 182 alloy (400X) showing both intra- and trans-granular (Ti, Nb)C precipitate chain formation.

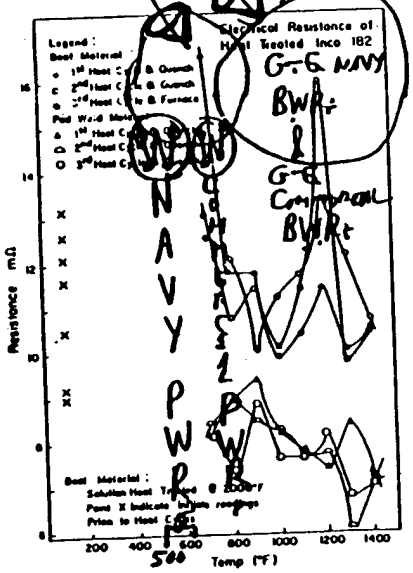


Fig. 3. Electrical resistance of non-age hardened INCO 182 alloy.

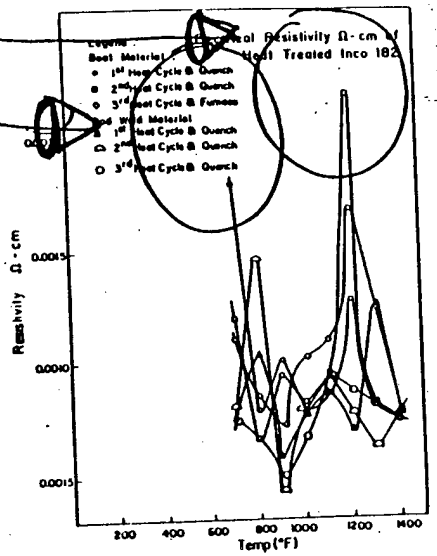


Fig. 4. Electrical resistivity of age hardened INCO 182 alloy.

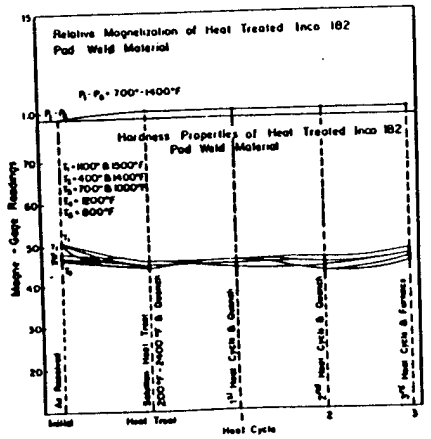


Fig. 5. Relative magnetization and hardness of age hardened INCO 182 alloy.

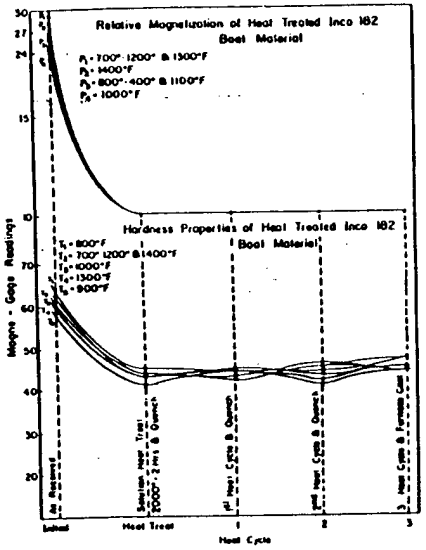


Fig. 6. Relative magnetization and hardness of age hardened INCO 182 alloy.

chronally) around 1200°F of amplitude 30 mΩ cm; this peak is presumably due to (Nb, Ti) C; NbC and TiC aligned precipitate structure formation and growth and concommitant removal of Nb, Ti and C solute atoms from the FCC (figs. 3 and 4) Ni based alloy matrix. This removal is also responsible for the concommitant large increase in relative magnetization; the paramagnetic–ferromagnetic transition via magnetic moment formation. This is because the Curie temperature of Ni FCC alloys is depressed by the addition of solute alloying elements (especially Nb and Ti) [2]. Removal of Nb and Ti from the Ni FCC solid solution matrix, will allow the Curie temperature in principle to rise through room temperature, where all of our measurements were performed, after a quench from ageing temperature into iced brine (at large velocity to prevent bubble formation and vapor lock, thermal barrier formation and to optimize quench rate) (figs. 5a and 6a).

X-ray diffraction [4] confirmed that precipitation during ageing occurrence not via carbide diffraction lines from the still low density of aligned precipitates, but via an observed clear increase in the d-spacings of the aged alloy.

Mössbauer spectroscopy [5] is currently underway to further study the magnetic structure of the unaged paramagnetic and aged ferromagnetic alloy. So far, it only confirms the ferromagnetic state formation via splitting of the single paramagnetic Mössbauer line in the unaged alloy into the characteristic sixfold Mössbauer peak structure in the ferromagnetic aged alloy.

Hot tensile testing [6] showed that the in service and furnace ageing increased the ultimate tensile strength from 63,200 Psi in the unaged (as cast) alloy to over 84,100 Psi in the aged alloy, agreeing with the large increase in hardness, and presumable yield point, seen upon ageing. An analysis indicated that this hardening, with concommitant loss of ductility, was responsible for the loss in fracture toughness and related catastrophic cracking of this alloy in service, and the equally severe embrittlement seen in the furnace aged alloy (unstressed an uncycled). This equality seems to rule out fatigue fracture as opposed to embrittlement fracture, but this is merely a tentative conclusion.

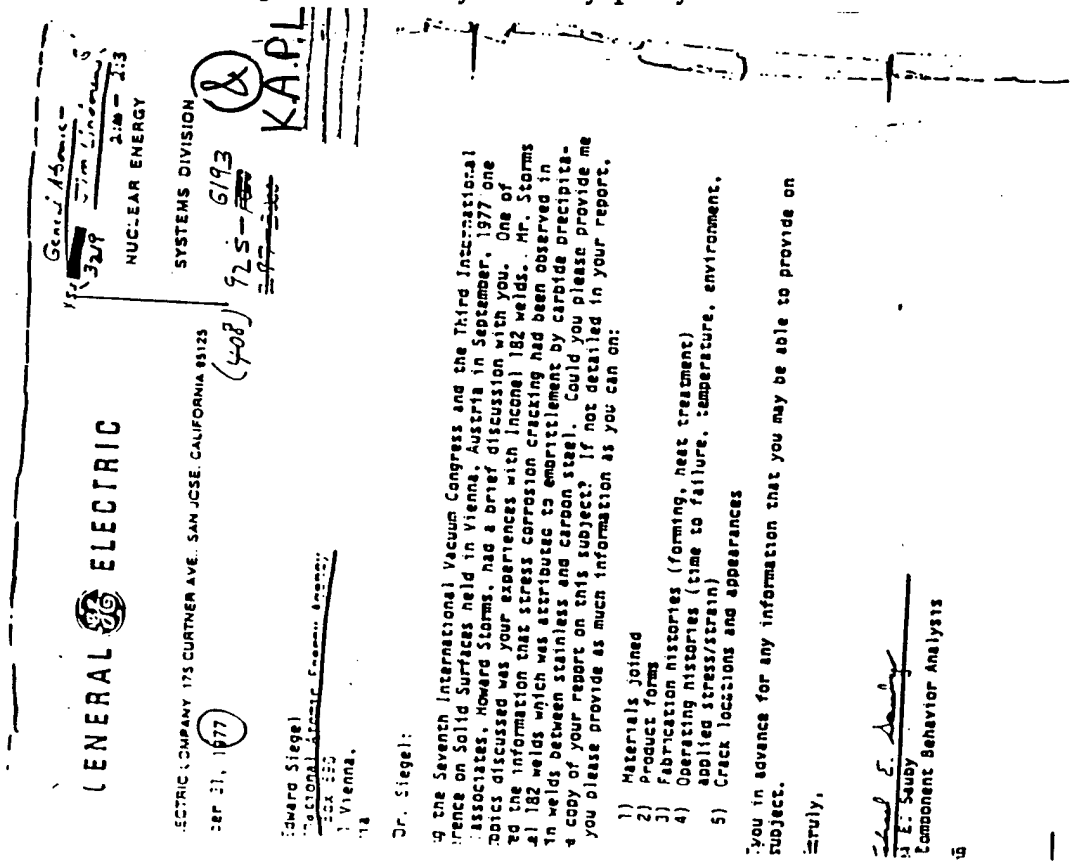
5. Theoretical considerations

The theoretical work of Hoselitz [7], Chickazumi [8], Dykstra [9] on magnetic properties of age hardened alloys with a ferromagnetic matrix and paramagnetic precipitates (the case here), and of Haasen [10], Martin [11] and McLaughlin [12] on the mechanisms of age hardening precipitate formation, as well as the Liebowitz–Kalos [13] stastical mechanics theory of ageing (Ostwald ripening) are being applied to this alloy currently. The magnetic theory is difficult (for paramagnetic precipitates in a ferromagnetic matrix), but the major thrust is to predict aligned precipitate time dependence of the alignment kinetics with the concommitant increase in magnetization with time. This is important for calibration of any magnetic NDT technique and for estimating the in service lifetime of alloys welds before solution treatment or replacement is warrented. The possibility of spinodal decomposition [13], as McLaughlin reported in NiTi FCC alloys [12], a simple 'model' of INCO 82 and 182, would produce

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GENERAL ELECTRIC

ELECTRIC COMPANY 175 CURTNER AVE. SAN JOSE, CALIFORNIA 95125

NUCLEAR ENERGY

SYSTEMS DIVISION

Mar 31, 1977

(408) 925-6193

K.A.P.L.

Edward Siegel
National Science Foundation
Room 339
Washington, D.C.

Dr. Siegel:

During the Seventh International Vacuum Congress and the Third International Conference on Solid Surfaces held in Vienna, Austria in September, 1977 one of my associates, Howard Storms, had a brief discussion with you. One of the topics discussed was your experience with Inconel 182 welds. Mr. Storms has the information that stress corrosion cracking had been observed in all 182 welds which was attributed to embrittlement by carbide precipitation. In welds between stainless and carbon steel. Could you please provide me a copy of your report on this subject? If not detailed in your report, you please provide as much information as you can on:

1) Materials joined
2) Product forms
3) Fabrication histories (forming, heat treatment)
4) Operating histories (time to failure, temperature, environment, applied stress/strain)
5) Crack locations and appearances

Thank you in advance for any information that you may be able to provide on this subject.

Very truly,

Paul E. Duby
Component Behavior Analysis

PED:ig

a non-linear alignment function and therefore a non-linear embrittlement and magnetization-in time; this calibration is a necessity and can only experimentally be performed by another 10–20 year experiment. Solution treatment maps have recently been experimentally derived [14] for reverting the aligned microstructure, embrittlement, hardness increase and magnetization for a series of time-temperature combinations, some as low as 15 minutes and as cool as 1400°F. Whether this can be applied to post operation weld solution treatment on welds in situ, or increased ambient temperature to prevent the ageing on welds in situ, remains to be experimentally determined [14].

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MIXED VALENCIES OF Eu IN INTERMETALLIC COMPOUNDS WITH THE $CaCu_5$ STRUCTURE *

E.R. BAUMINGER, I. FELNER and S. OFER
Racah Institute of Physics, The Hebrew University, Jerusalem, Israel

The Mössbauer spectra of $EuNi_xZn_{5-x}$ and $EuNi_xCu_{5-x}$ compounds are composed of three subspectra: one corresponding to Eu^{2+}, one to Eu^{3+} and one to Eu in a mixed valence state. The mixed valency is interpreted in terms of fast fluctuations between $4f^6$ and $4f^7$ configurations. The energy necessary to make an intereonfiguration excitation depends on the number of Ni neighbours of Eu, on x and on the temperature. Susceptibility measurements are consistent with the analysis of the Mössbauer experiments. The dependence of the magnetic hyperfine fields, the Curie temperatures and the isomer shifts on x, is discussed.

1. Introduction

In most compounds rare earth ions appear in well defined valence states. In recent years a number of "mixed valence" compounds have been found which exhibit properties indicating that the rare earth ions in these compounds are in an intermediate or mixed valence state.

The mixed valence compounds can roughly be divided into four groups. (i) Compounds in which the rare earth ions with different valency occupy inequivalent lattices sites, as in Eu_3O_4 [1]. In this case the valence distribution is static and no fluctuations take place. (ii) Compounds in which all rare earth ions occupy equivalent lattice sites, but the ratio R between the number of ions in each valence state is dictated by the stoichiometry of the compounds, as in Sm_3S_4 [2,3]. In this case the ratio R will be independent of temperature but hopping of an electron between the ions might occur. The "hopping" frequency will usually be temperature dependent. (iii) Compounds in which all rare earth ions occupy equivalent lattice sites, R is not determined by stoichiometry and is temperature independent. In these compounds only the ionic ground state is occupied, but its wave function is a linear combination of atomic orbital wave functions. (iv) Compounds in which R is temperature dependent. In this case two different valence states are energetically very close and populated at temperatures at which measurements are performed. The temperature dependence of R is a result of the change of the relative population of the two states with temperature [4,5]. Fluctuations between the two states usually take place and the fluctuation frequencies might or might not be temperature dependent. These compounds are referred to as fluctuating valence compounds [6]. The most direct evidence for such interconfiguration fluctuations (ICF) is provided by Mössbauer isomer shift data of ICF systems containing Eu ions [4].

Different techniques have been employed to study mixed valence compounds. Among them, only X-ray photoelectron spectroscopy (XPS) and the Mössbauer effect are of microscopic nature. The time resolution of the Mössbauer effect is determined by the lifetime of the nuclear level involved in the Mössbauer transition and is about 10^{-9} s. The ICF rates observed so far are faster than 10^{11} s^{-1}, resulting in well defined spectra with parameters intermediate between those corresponding to the fluctuating states [4].

From all rare earth ions which may exhibit mixed valence properties (Ce, Sm, Eu, Tb, Tm and Yb) Eu isotopes are the most sensitive for studies of mixed valence phenomena by the Mössbauer effect. The isomer shift in a Mössbauer spectrum is a straightforward measure of the electronic configuration of the ion. Isomer shifts, S, measured with the 21.6 keV gamma ray of ^{151}Eu between compounds in which Eu is divalent and trivalent are about 14 mm/s, whereas the natural line width, 2Γ, of the resonant absorption line of the 21.6 keV gamma ray of ^{151}Eu is 1.3 mm/s. The ratio $S/2\Gamma$ is therefore ~10 for ^{151}Eu. This ratio

* This research was supported by a grant from the United States – Israel Binational Science Foundation (BSF), Jerusalem, Israel.

Westinghouse Electric Corporation

Nuclear Energy Systems

NES 83-45

May 5, 1983

Dr. Edward Siegel
Consultant
415 Seventh Avenue
San Francisco, CA 94118

Dear Dr. Siegel:

Westinghouse-designed nuclear steam supply systems utilize Inco 182 electrodes in the buttering of the reactor vessel nozzles and for joining the stainless steel safe-ends to the buttered reactor vessel nozzles. While we do not dispute your claim that it is possible for weld metal deposited with Inconel welding electrodes 182 to exhibit increased hardness and a reduction in fracture toughness following prolonged aging at temperatures greater than 1000°F, it should be recognized that Westinghouse pressurized water reactors are designed to operate at a maximum temperature of 650°F. Further, we cannot envision any thermal transient that would raise the temperature above 650°F at the safe-end regions.

The weld procedure for joining the stainless steel safe-end to the buttered reactor vessel nozzle requires that the maximum interpass temperature be 400°F. In addition, no post-weld heat treatment is performed on the weldment. In the case of the buttering of the reactor vessel nozzles with Inco 182 electrodes, the maximum interpass is 400°F and the weldment undergoes a post-weld heat treatment at 1150°F for 40 hours. Data generated following the 40 hour heat treatment at 1150°F shows that there is no appreciable increase in the ductility (reduction in area and elongation) or increase in the yield and tensile strength.

Westinghouse recognizes that weld metal deposited with Inconel welding electrodes may undergo magnetic transformation from paramagnetic to ferromagnetic during high temperature aging. Within the Corporation we have the instrumentation and technology to measure small changes in the magnetic characteristics of alloy systems, if so desired. However, the data cited above indicates that there is no appreciable degradation in mechanical properties after 40 hours at 1150°F. It follows that the aging process is very sluggish and thus does not pose a challenge to the integrity of the PWR system.

We appreciate the information you provided Westinghouse, but we do not believe that a NDT weld monitoring device is needed at this time because of the above stated reasons. We will continue to follow your work via your technical publications in the open literature.

Sincerely yours,

Nuclear Stern

THIS IS A FEDERAL FELONY!

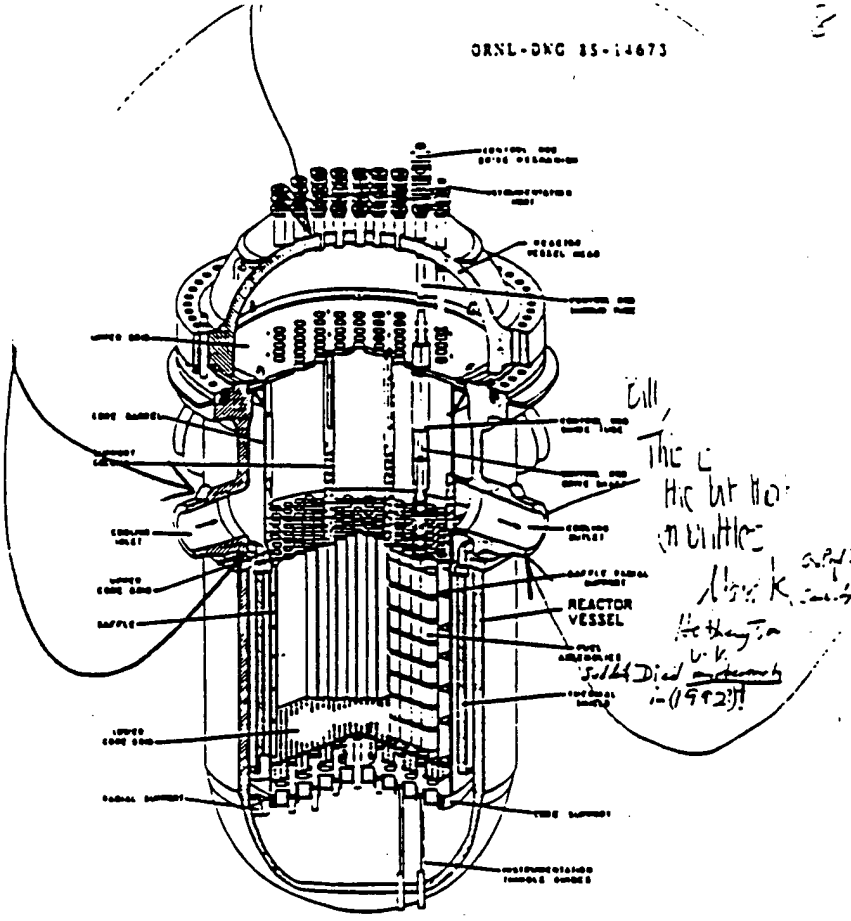
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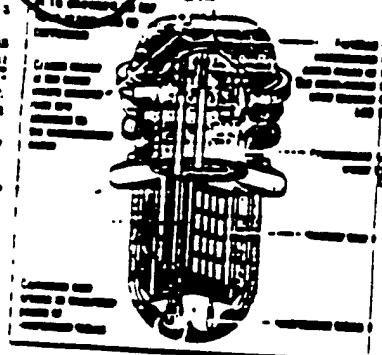
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'Leaks' alert over nuclear power plants

EXCLUSIVE

Roman Rolinick

AGEING NUCLEAR REACTORS



An ill wind blows for the feathered invasion

SHOPPING



Siegel
(1973-1978)
Prediction
(read on)
Now (1992)
Covers some of
known:

5-C.

France!
&
Some to watch:
Spain
Italy
Korea
Japan (12)
U.S (111)

Dr. G Siegel
TAT
21 Naples Rd
Brookline MA 02146 USA

Both, the boron carbide/steel melt formed and the melt constituents react eutectically with the coolant channel wall made of Zircaloy, giving rise to Zircaloy liquefaction around 1250 °C. In this way, the Zircaloy cladding material is already liquefied well below its melting point of 1760 °C. The result of this lowering of the melting point is the beginning of UO_2 dissolution at "low" temperatures. In the upper bundle zone the Zircaloy cooling channel wall is destroyed so that the melt can spread radially and relocate downward. As a result, coolant channel blockages develop in the bottom part of the bundle.

Influence of Quenching

Quenching of the hot bundles by water caused further fragmentation and an enhanced Zr/H_2O reaction resulting in a temperature rise at the top of the bundle, although the electric power supply was shut off, and in additional hydrogen generation. Some further meltdown of material in the upper bundle regions was observed due to the additional exothermic Zr/steam interactions and the resulting high temperatures.

The water entering the bundle and the developing steam cause a thermal shock on the embrittled materials, generating new surfaces. The steam reacts with the metallic components of the newly formed surfaces, and, as a result of the exothermal Zr/H_2O reaction, local temperature escalations take place again. The additional hydrogen formed at this point in time is quite considerable, i.e. up to about 80% of the total hydrogen. In the LOFT experiment FP-2 the percentage of hydrogen generated during the reflood was approx. 80%.

Hydrogen Generation

The results from the CORA tests support the conclusion that hydrogen generation during severe accidents will continue, assuming a sufficient steam supply, up to complete consumption of the available Zircaloy and stainless steel. One of the mechanisms for reducing hydrogen generation is the removal of hot materials from the high temperature oxidation zone into a cooler zone. During the tests, because little material relocated from the high temperature region to the steam cooled region, hydrogen generation continued until either termination of the test or complete consumption of the hot available Zircaloy and stainless steel. Re-flood of the hot bundle (quenching) resulted in an additional strong hydrogen generation as described in section 5.10 [Influence of Quenching].

Influence of Bundle Size

The larger fuel rod bundles (CORA-7 and CORA-18) with 57 and 59 fuel rods, respectively, compared with 25 fuel rods in the smaller bundles, did not show any different material behavior. In general, similar physical and chemical phenomena were observed as in the smaller bundles. Temperature escalation started at about 1200 °C and continued

damage progression within the bundles. After the tests, the upper parts of the bundles were free of any absorber material. This material has relocated to the lower (i.e., cooler) part of the bundle.

Influence of Heat-up Rate

The only CORA experiments performed so far with lower heat-up rates of 0.2 K/s and 0.3 K/s, respectively, (CORA-30 and -31) compared to 1 K/s demonstrated clearly that no temperature escalation due to the exothermal Zircaloy/steam interactions takes place. The chemical interaction energy formed caused only an increased heatup rate between 1200 and 1800 °C of about 1 K/s. The oxide layer which has formed on the cladding outer surface during heatup delays the chemical interactions between Zircaloy and steam since the diffusion of oxygen through the ZrO_2 layer is the rate-determining step. The Zircaloy will be almost completely oxidized, or at least converted into α-Zr(O), before reaching the melting point of oxygen poor (as-received) Zircaloy at about 1760 °C. As a result, large UO_2 fuel liquefaction by molten Zircaloy will not take place; this means smaller fission product release rates and it requires much higher temperatures 2850 °C before UO_2 melting and relocation occurs.

AGING AND COMPONENTS

One area with a major impact on the safety and reliability of the current generation of nuclear plants, and one in which a great deal of research is being performed, is plant aging. Aging is a major concern because, as the components and structures age, safety may be affected if degradation occurs and goes undetected. Understanding the aging process becomes even more important in the context of plant lifetime extensions because the level of safety must not degrade during the life extension. In the two sessions on this topic, researchers addressed aging-related issues of Class 1E power systems, reactor protection systems, cables, motor-operated valves, gate valves, control rod drive systems, safety-related pumps, pressure transmitters, and snubbers.

R. Lofaro's paper entitled "Detecting and Mitigating Aging in Component Cooling Water Systems,"[9] exemplifies the importance of the aging research. On the basis of operating experience, Lofaro showed that the Component Cooling Water system components are susceptible to aging degradation and that this degradation leads to an increase in the failure rate as the components age. Of the failures reviewed, 72% were related to aging, 16% to non-aging, and 12% were of unknown cause. The dominant failure mechanism was "wear" (37%), followed by calibration drift (12%), contamination (9%), corrosion/

Not surprisingly, valves were the components that failed most commonly (47%), followed by pumps (19%), instrumentation (12%), and heat exchangers (11%). The data were not normalized to account for population effects; therefore valves are the dominant components failing because of their large population. However, these findings do show which components require the most resources in terms of monitoring and maintenance. More important however, Lofaro showed, on the basis of a probabilistic risk assessment, that, because of the redundancy of the components, if component failure rates increase linearly with age, the unavailability of the system can increase exponentially.

The next question is: What can be done to control aging? Phase II of Lofaro's research addressed this question. Controlling aging requires a two-step process involving detection and mitigation. It is important to be able to detect aging degradation before it results in failure, and it is equally important to mitigate the effects of degradation once it is detected. Lofaro investigated the various methods of managing aging: inspection, surveillance, monitoring, and maintenance (ISM&M). "From the study results it is seen that the currently used ISM&M practices fall into two categories: basic practices, which are typically required by codes or plant technical specifications, and supplemental practices, which are selected based on particular plant operating characteristics and environment. The basic practices alone are not comprehensive enough to control all types of aging degradation. An effective ISM&M program requires a combination of basic and supplemental practices to ensure that at least one method is in place to detect and mitigate each of the common aging mechanisms that may lead to component failure." This shows that proper detection and mitigation of aging degradation should be an important part of daily plant operation.

A paper by M. Jacobus,[10] Sandia National Laboratories (SNL), reported on a long-term project to assess aging in Class 1E electric cables. "The objective is to determine suitability of such cables for beyond-40-yr lifetimes and to assess various condition monitoring (CM) techniques used to predict remaining cable life. Typical qualification programs simulate aging by applying radiation aging [typically 100 to 1000 krad/h (1 to 10 kGy/h)] and thermal aging separately. The experimental program used by Jacobus employs considerably less accelerated, simultaneous thermal and radiation aging conditions [100 °C, 10 krad/h (0.10 kGy/h)] followed by a simulated accident

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An Investigation of the Thermal Stability of a Commercial Ni-Cr-Fe-Mo Alloy (Hastelloy Alloy X)

G. Y. LAI

The changes in hardness and room temperature impact toughness of Hastelloy * Alloy X after aging at 1000, 1200, 1400 and 1600°F (538, 649, 760 and 871°C) for times up to 10,000 h were investigated. The alloy exhibits age-hardening at 1200 and 1400°F (649 and 760°C). A slight hardness increase was observed at 1600°F (871°C) followed by overaging after 4000 h. No age-hardening was observed at 1000°F (538°C) up to 10,000 h. Aging at all temperatures resulted in a [illegible] in room temperature impact toughness. The microstructure after aging was characterized by optical metallography and X-ray diffraction, while fracture mode was characterized by scanning electron microscopy. The results suggest that the toughness degradation is primarily associated with carbide precipitation. M_6C type carbides are believed to be the major phase precipitated during aging at all temperatures, although σ and μ phases were also detected after 10,000 h at 1400 and 1600°F (760 and 871°C), respectively.

1. INTRODUCTION

THE high temperature gas-cooled reactor (HTGR) designed by General Atomic is a uranium-thorium-fueled, graphite moderated reactor system in which the fission heat generated in the reactor core is transferred, by high-pressure helium coolant gas, to steam generators wherein superheated steam is generated for power generation. The primary coolant outlet temperature in the HTGR typically lies within the range 1200 to 1500°F (648 to 816°C). This reactor system contains many metallic components that must operate for very long times (up to 40 years) under these elevated temperature conditions. Since it is known that the microstructure and mechanical properties of high temperature alloys can change during such exposure, due to thermal aging, it is necessary to quantify such changes in the materials used in component design. Thus, as a part of the program in support of the development and design of HTGRs, a systematic investigation of the thermal stability of several high temperature alloys is underway at General Atomic. This paper presents the results of an investigation into the aging kinetics and the changes in microstructure and room temperature impact toughness of Hastelloy Alloy X as a result of aging for times up to 10,000 h.

2. EXPERIMENTAL PROCEDURES

Material in plate form (1.27 cm thick) was purchased in the solution annealed condition to Specification AMS 5536. The chemical analysis (in wt pct), as supplied by the vendor, was as follows: 0.11 C, 0.58 Mn, 0.022 P, 0.006 S, 0.32 Si, 21.41 Cr, 19.28 Fe, 8.64 Mo, 2.16 Co, 0.52 W, <0.002 B, and balance Ni. The grain size was ASTM No. 5.

The sample blanks (1.27 × 12.7 × 17.78 cm) were aged in air furnaces. Aging was conducted at 1000, 1200, 1400 and 1600°F (538, 649, 760 and 871°C) for times up to 10,000 h. Samples for hardness, microstructural examination and impact toughness testing were obtained from aged blanks after removal of the oxide scale and the surface layers affected by surface oxidation.

All impact tests were conducted on standard Charpy V-notch specimens in accordance with the requirements of ASTM E23-72. The notch of the Charpy specimens was aligned parallel to the rolling direction and perpendicular to the surfaces of the plate. The fracture surface was examined in a Hitachi scanning electron microscope operating at 25 kV. Hardness was measured in a Rockwell hardness tester.

Microstructure was characterized by optical metallography and X-ray diffraction. Metallographic specimens were etched electrolytically in oxalic acid. The residue samples for X-ray diffraction analysis were obtained by electrolytically extracting the aged samples using an electrolyte containing 10 pct HCl in methanol. A Guinier De Wolff camera was used in conjunction with CuK_α radiation.

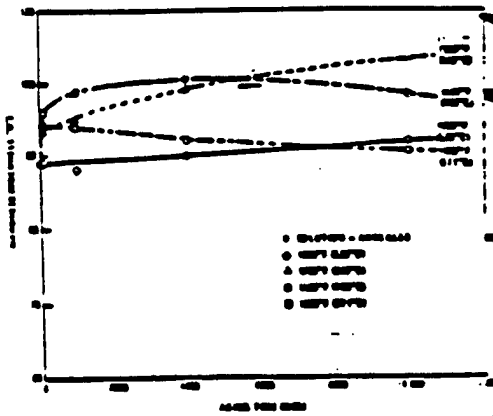


Fig. 1—Hardness changes over the 10,000 h aging period

G. Y. LAI is Staff Engineer, General Atomic Company, San Diego, CA 92138.

Manuscript submitted April 18, 1977.

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FRAUD BY: ABDUL. CURR./HAYNES-JR. ET AL PRUDENTIAL INSURANCE & BROWN, LANIS GITHENS & AHN (Merchant Bank) & ASHRAHANI!

POTENTIAL POSSIBLE AIR COMBAT WEAPON

UNBELIEVABLE!

3. RESULTS

Hardness changes over 10,000 h are presented in Fig. 1. The changes in room temperature impact toughness as a function of aging time up to 10,000 h are illustrated in Fig. 2. Figure 3 shows the fracture appearance of Charpy impact specimens aged for 10,000 h as opposed to unaged specimens. Optical photomicrographs showing microstructures in the as-received condition and after aging for 10,000 h are shown in Figs. 4(a) and (b), respectively. Table I summarizes the X-ray diffraction results for the electrolytically extracted residues obtained from unaged samples and samples aged for 1000 and 10,000 h.

4. DISCUSSION

1000°F (538°C) Aging

Aging at 1000°F produced a continuing drop of room temperature impact toughness up to 10,000 h. Virtually no matrix precipitates were observed by optical metallography in the samples aged up to 10,000 h. Hardness remained essentially unchanged. Extensive grain boundary precipitates were observed after 1000 and

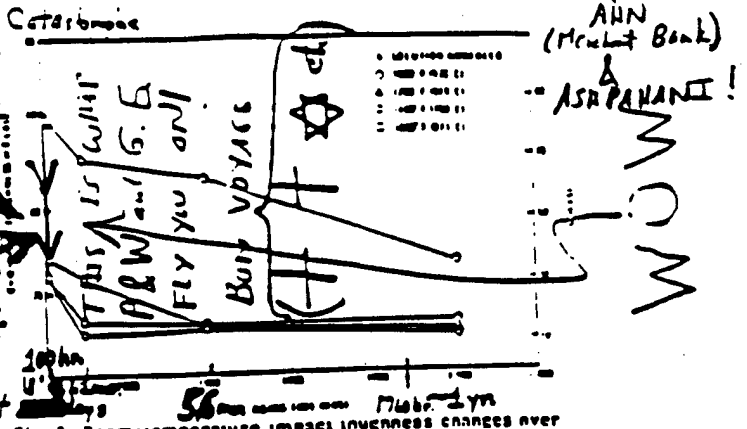


Fig. 2—Room-temperature impact toughness changes over the 10,000 h aging period.

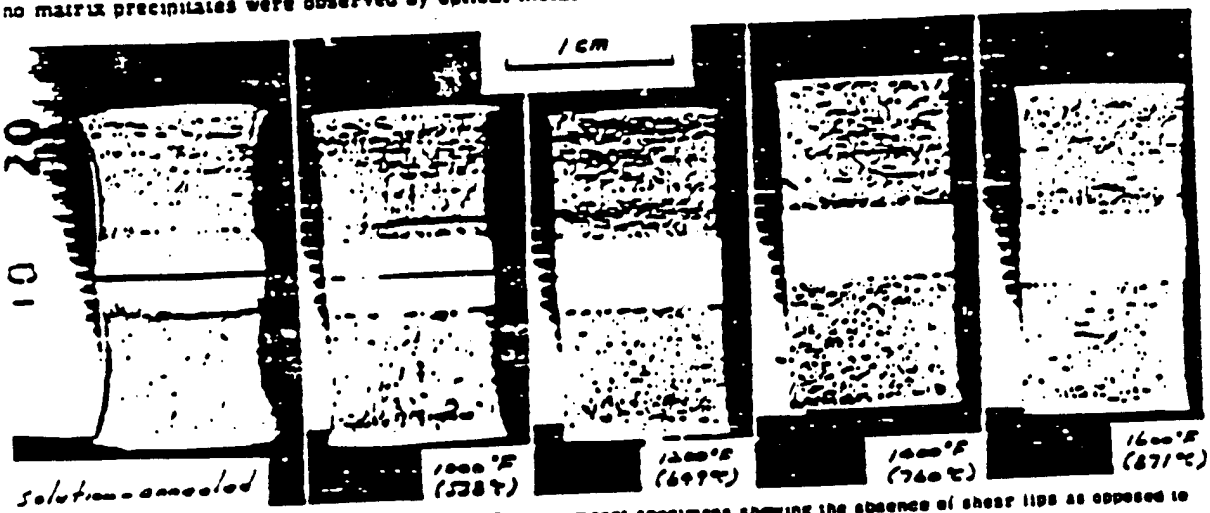


Fig. 3—Fracture appearances of the 10,000 h aged Charpy impact specimens showing the absence of shear lips as opposed to the solution-annealed specimen.

No ductility

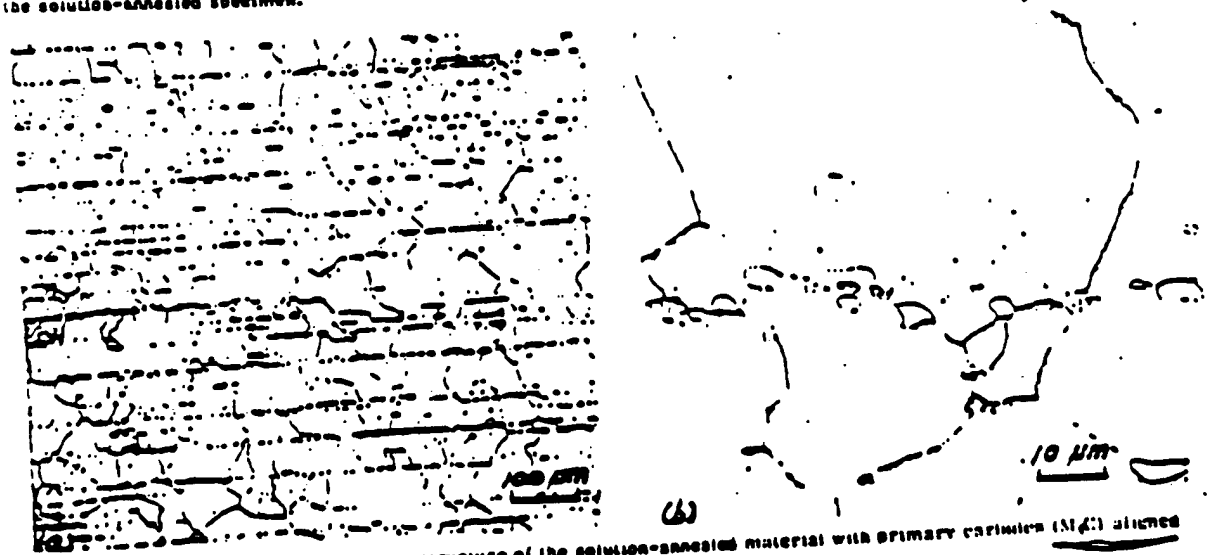


Fig. 4—Photomicrographs showing microstructure of the solution-annealed material with primary carbides (light) aligned parallel with the rolling direction.

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CENERAL

Hastelloy X is a nickel-base superalloy with good oxidation resistance at temperatures up to 2200 F and moderate to good strength properties at temperatures up to 1600 F. It is essentially a single-phase austenitic alloy, which is solid-solution strengthened by additions of chromium, molybdenum and tungsten. Wrought products are normally used in the solution-treated condition and cast products in the as-cast condition. The alloy has excellent forming and brazing characteristics, and it can be hot and cold formed using techniques of proper procedures and care are observed. Aerospace applications for Hastelloy X include jet engine tail pipes, baffle, afterburner components, cabin heaters, and structural parts in the burner and turbine sections. It is also used in many industrial furnace applications because of its resistance to oxidizing, reducing, carburizing, and nitriding atmospheres. In the chemical and petrochemical industries, it is used for many components, such as retorts, support grids, baffles, tubing, and driers, because of its excellent combination of corrosion resistance and heat resistance. In addition, a low-cobalt (0.50 percent maximum) version of the alloy, designated Hastelloy X-250, is used for structural parts in nuclear reactors. The difference in cobalt content has minimal effects on mechanical properties (1-7).

1.01 **Commercial Designation**
Hastelloy X.

1.02 **Alternate Designations**
Hastelloy Alloy X (Cabot Corp.), UNS N06002, AISI 630 (castings), Pyromet 680 (Carpenter Technology), Unitemp HX (Cyclops Corp.), and Sumalloy HX (Simonds Steel).

1.03 **Specifications**
Specifications, Table 1.03.

1.04 **Composition**
Composition, Table 1.04.

1.05 **Heat Treatment**

1.051 Wrought products are normally supplied by the mills in the solution-treated condition, which provides the optimum combination of mechanical properties and corrosion resistance for practically all applications. This treatment consists of exposure to 2150 F followed by rapid cooling. The hold time at 2150 F varies with the section size of the product, size of load, and furnace-charge characteristics; a rule of thumb that provides acceptable results for the product being treated is to hold for 1 hr per inch of thickness. The cooling rate from 2150 to 1000 F or below should be rapid enough to prevent carbide precipitation, which decreases corrosion resistance and toughness. For sheet products, rapid air cooling is adequate, oil or water quenching is frequently necessary for heavier sections. If surface oxidation can be tolerated, the solution treatment can be carried out in air or in the normal mixture of air and combustion products in gas-fired furnaces. Oxidation can be minimized by the use of an endothermic furnace atmosphere, or it can be almost entirely prevented by dry hydrogen, dry argon, or vacuum atmospheres (1,7,17).

1.053 Following all hot-forming and most cold-forming operations, solution treatment should be carried out to restore optimum properties. An exception would be, for example, the use of as-cold-rolled sheet to take advantage of its improved room-temperature strength (7).

1.053 Solution treatment is recommended after welding of wrought products to restore optimum corrosion resistance in the weld area (7).

1.056 Intermediate softening during severe cold-forming operations should be accomplished with the full solution treatment because it provides optimum ductility and formability (7).

1.058 Stress relief at intermediate temperatures is not applicable because it tends to cause carbide precipitation and associated decreases in corrosion resistance, ductility, and toughness (7).

1.06 **Hardness**

1.061 Effects of exposures at various elevated temperatures on hardness of sheet and plate at room temperature, Figure 1.061.

1.062 Effect of cold work on hardness, Figure 1.062.

1.07 **Forms and Conditions Available**

1.071 Wrought products are available in the form of sheet, strip, plate, bar, tubing, wire, welding electrodes, and billet stock.

1.072 Cast products are available in the form of sand castings, investment castings, and centrifugal castings.

1.08 **Melting and Casting Processes**

1.081 Hastelloy X can be produced by any of the electric-arc or induction melting processes either in air or vacuum. The use of vacuum, of course, leads to improved toughness and fatigue properties. Most wrought products are produced by electric furnace or vacuum induction melting followed by electroslag remelting (18).

1.09 **Special Considerations**

1.091 A pronounced reduction in ductility occurs in the temperature range 1000 to 1500 F, which is characteristic of most nickel-base superalloys. (See Figure 1.0313.)

1.092 Exposure in the temperature range 1000 to 2000 F causes carbide precipitation and age hardening followed by overaging. During the initial phases of carbide precipitation, room-temperature hardness and strength increase, but during overaging they decrease to ultimate levels considerably below those of the solution-treated alloy. The time period for the hardening phase, until the onset of overaging, varies from several thousands of hours at 1200 F and below, to practically zero at temperatures of 1700 F and above. Room-temperature ductility and impact energy, on the other hand, decrease concurrently from the start of carbide

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FAA (1987)

HEAT-N'-SAVE SOLUTION LTD.
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SAN FRANCISCO, CA. 94118
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OFFICE OF THE REGIONAL COUNSEL
FEDERAL AVIATION ADMINISTRATION
NEW ENGLAND REGION
12 NEW ENGLAND EXECUTIVE PARK
BURLINGTON,MA.01803

RE: PROPOSED RULE FOR JT8D-SERIES TURBOFAN ENGINE SLEEVE SPACERS:

GENTLEMEN:

I WOULD LIKE TO GO ON RECORD AS TOTALLY SUPPORTING THIS PROPOSED RULE FOR JT8D-SERIES TURBOFAN ENGINE SLEEVE SPACES BIGGROUS [illegible] SPECIFIC. HOWEVER, I WOULD LIKE TO STRONGLY OBJECT TO:

(A) THE VERY LIMITED,OSTENSIBLY CONSERVATIVE,BUT IN VIEW OF THE CONTINUING SEQUENCE OF DIRECTLY ENGINE FAILURE CAUSED CATASTROPHIC IN-SERVICE CRASHES,FURTHER ERODING PASSENGER CUSTOMER-BASE BELIEF IN THE COMPETENCE OF AIR CARRIERS UNIVERSALLY TO PROVIDE SAFE AIR TRAVEL SERVICE AS ADVERTISED,AND IN THE F.A.A.TO SUCCESSFULLY MONITOR SAME AND PROVIDE TOTALLY EFFECTIVE Q.A.,VERY RADICAL,RISKY, AND EXTREMELY FOOLHARDY ! MANY MORE...ALL COMPONENTS SHOULD BE SUBJECTED TO VERY THOROUGH N.D.T.(ULTRASONIC,EDDY CURRENT,ACOUSTIC EMISSION,MAGNEFLUX,RADIOGRAPHIC....)IN FULL ENGINE OFF-WING STRIPDOWN (REF:AVIATION WEEK & SPACE TECHNOLOGY,P.31,SEPTEMBER 2,1985)

(B) THE CONTINUED LACK OF APPRECIATION OF THE "SUPER"ALLOY COMPONENT UNIVERSAL GENERIC THERMAL-LEADING-TO-MECHANICAL EMBRITTLEMENT INSTABILITY CAUSING SEVERE IN-SERVICE DEPRESSION OF(ESPECIALLY IN HASTELLOY-X,BUT ALSO NIMONICS,UDIMETS AND ALL OTHER "SUPER"ALLOYS: RESISTANCE TO THERMAL SHOCK...MECHANICAL SHOCK,BRITTLE,FATIGUE,STRESS CORROSION....CRACK NUCLEATION,PROPAGATION,FRACTURE AND FAILURE FOR ALL COMPONENTS OF ALL ENGINES.

FIRST POINTED OUT BY ME FOR NUCLEAR-,FOSSIL-FUEL,PETROCHEMICAL... PLANT TRANSITION-WELD ALLOY INCO-182/82.NEARLY IDENTICAL METALLURGICALLY(REF:E.SIEGEL,JOURNAL OF MAGNETISM AND MAGNETIC MATERIALS, 7,312(1978);A.MAYO,VILLAGE VOICE,P.40,AUGUST 21,1978;INTERNATIONAL CONFERENCE ON MAGNETIC ALLOYS & OXIDES,THE TECHNION,HAIFA(1977)) TO HASTELLOY-X(AND OTHER ENGINE "SUPER"ALLOYS) AS CLEARLY MARKED ABOVE REPEATEDLY YET POINTEDLY IGNORED BY F.A.A.,N.T.S.B.,AND AIR-LINE INDUSTRY(ESPECIALLY ENGINE MANUFACTURERS,AIR CARRIERS AND INSURANCE UNDERWRITERS)QUITE NEGLIGENTLY:

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REFS:

- U.S.DEPARTMENT OF DEFENSE Aerospace Structural Metallic Materials Handbook, CODE#4112,BY J.M.KATTUS,BATTELLE MEMORIAL INSTITUTE(DEC.,1983)
- G.SABOL AND R.M.STICKLER,Physica Status Solidi,35,11(1969)
- G.Y.LAI,Metallurgical Transactions A,I.M.E.,9A,827(1978)
- C.C.LI,W.R.JOHNSON AND L.D.THOMPSON,General Atomic Rept #GA-A15511, U.S.DEPARTMENT OF ENERGY(1979)
- G.Y.LAI,General Atomic Rept,#GA-A15016,U.S.DEPARTMENT OF ENERGY(1978)
- CUSTOMER PRODUCT BULLETINS-HAYNES-STELLITE,CABOT,SIMMONDS,CYCLOPS, CARPENTER....-MAJOR HASTELLOY-X SUPPLIERS TO ENGINE MANUFACTURERS
- H.RICHARDS,SUPPRESSED WARNING MEMOS,PUBLIC SERVICE ELECTRIC & GAS ENERGY LABORATORY(1950'S & 1960'S)
- U.S.NUCLEAR REGULATORY COMMISSION Procedures For Heat-Treatment of Embrittled Pressure Vessels,Piping,Primary Coolant Loop Transition-Welds(1982...)

IT IS ABUNDANTLY CLEAR THAT THIS IS A GENERIC EMBRITTLEMENT PROBLEM, SEVERELY DETRIMENTALLY ALTERING AS-DESIGNED PERFORMANCE CHARACTERISTICS OF ALL COMPONENTS,ESPECIALLY HASTELLOY-X COMBUSTION CHAMBERS. WILL PROVIDE A CONTINUING AND INCREASING THREAT TO AIR CARRIER SAFETY (AS WELL AS CUSTOMER BASE AND PROFITS) THAT IS ON-GOING AND WILL NOT GO AWAY DESPITE ENGINE MANUFACTURER,ALLOY SUPPLIER,AIR CARRIER,INSURANCE UNDERWRITER,F.A.A.,N.T.S.B.,PENTAGON....DENIALS OR SHEER IGNORANCE !

SOME CONCURRING REFERENCES ARE:

- PROF.W.B.PEARSON,UNIVERSITY OF WATERLOO(CANADA)-DEAN OF CARBIDE CHEMISTRY
- PROF.W.WILLIAMS,UNIVERSITY OF ILLINOIS-DEAN OF CARBIDE MECHANICAL PROPS.
- DR.E.STORMS,LOS ALAMOS NATIONAL LABORATORY-CARBIDE CHEMISTRY EXPERT
- DR.C.TATRO,....LAWRENCE LIVERMORE NATIONAL LABORATORY-DEAN OF N.D.T.
- DR.L.TENNET,NATIONAL BUREAU OF STANDARDS,DIRECTOR,ALLOY DATA BASE SECT.
- PROF.J.JARRON,SIMON FRASER UNIVERSITY(CANADA)-ALLOY MAGNETICS EXPERT
- DRS.R.GOVILLA & P.BEARDMORE,FORD MOTOR CO.SCIENTIFIC LABORATORY-EXPERTS IN CARBIDE FRACTURE AND SUPERALLOY METALLURGY.
- DR.R.WEEMS,MATERIALS SCIENCE DIVISION,ARGONNE NATIONAL LABORATORY
- MR.G.LEWIS,PRESIDENT,NON-DESTRUCTIVE TESTING CORP,MANVILLE,N.J.-FAA CERTIFIED

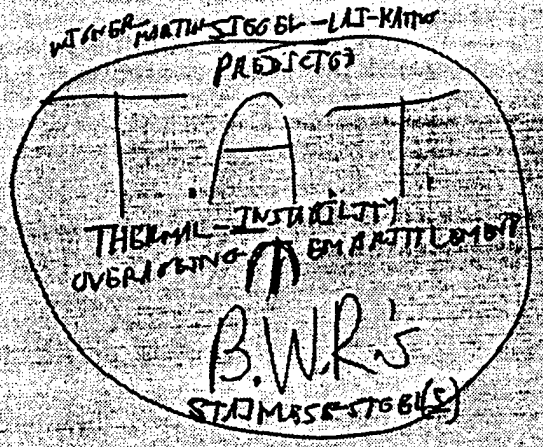
I SINCERELY HOPE THAT THE F.A.A.WILL TAKE THIS DANGER SERIOUSLY. OUR HEAT-N'-SAVE PROPRIETARY HEAT-TREATMENT FOR REJUVENATION OF IN-CRACKED JET ENGINE COMPONENTS,AT MINIMAL COST,RESULTING IN DECREASED N.D.T.,Q.A.,MAINTAINANCE,LABOR AND SPARE COMPONENT REPLACEMENT COSTS AND,MOST IMPORTANT,THE REQUIRED AIR SAFETY MANDATED,STANDS READY TO PROVIDE THIS CRUCIAL SERVICE,MILITATED BY SERIOUS QUESTIONS OF ENGINE AND AIR TRAVEL SAFETY !

MOST RESPECTFULLY & URGENTLY,

DR.[illegible] SIEGEL,METALLURGIST

US Nuclear Power Plants—Showing Their Age

Case Study: Core Shroud Cracking



By Robert Pollard

Union of Concerned Scientists

September 1995

(9/95)

I.63

VERY-SPECIFIC-FILE

Abstract

As more nuclear power plants approach middle age, it is becoming increasingly clear that a wide variety of degradation mechanisms pose significant economic and safety risks. Since the Nuclear Regulatory Commission (NRC) confirmed that age-related degradation in boiling water reactors (BWRs) will damage or destroy vital internal components well before the standard 40-year BWR license expires, federal regulators must now seriously address the future safety and engineering implications of multiple component failures in BWRs. State regulators must also take a long-range view and reexamine the cost-effectiveness of their current response to the aging-reactor crisis—a response that favors a piecemeal, fix-or-replace-at-any-cost strategy. And they must put in place the necessary financial incentives to minimize future costs to their customers without compromising nuclear plant operating safety standards.

This paper focuses on just one age-related problem confronting the nuclear power industry: degradation of the internal components in BWR pressure vessels. This study found that the nuclear industry—the regulated and the regulators alike—is not prepared to deal with the grave age-related problems that lie ahead. Prudent officials at all levels of government need to adopt a broad-gauged management plan to meet current and future engineering and economic challenges. A piecemeal, one-component-at-a-time approach may have been appropriate in the past, but it is simply no longer in the public interest, nor in the interest of the nuclear industry, to continue in this manner.

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By placing top priority on the more immediate safety implications associated with cracks in the core shroud—a legitimate concern given the NRC's charter—industry and NRC officials have implicitly elected to follow a piecemeal strategy for dealing with a broad range of age-related BWR issues. The industry and its regulators appear to be deliberately avoiding a comprehensive, systemwide, long-range approach.

On two counts, this is a dangerous precedent. First, once removed from its larger context, the true significance of the failure of any one component will be greatly underestimated, as will the synergistic effects that are likely when two or more components simultaneously experience a failure.

Second, a piecemeal approach can only treat the symptoms of a problem, not the problem itself. The root problem facing the BWR industry is not cracks in the core shroud or degradation in any of the other two dozen internal components of the reactor vessel known to be susceptible to stress corrosion cracking, creep, fatigue, embrittlement, and erosion; nor is it any one of the multiple valves, motors, pipes, seals, supports, and electrical wires that are experiencing age-related degradation. The real—and thus far neglected—problem facing federal and state-level regulators is that they don't have a detailed picture of the long-term cost-effectiveness and reliability implications of the nation's aging BWR plants. Only when regulators have such a picture can they make sense of what cracks in the core shroud and other aging problems really mean to utilities and their customers—and only then can they make enlightened decisions in the public interest.

Technical Background

The Core Shroud

As shown in figure 1, the core shroud is a 360-degree stainless steel cylinder surrounding the BWR core. Typically, a core shroud will measure 20 feet in height, 14 to 17 feet in diameter, and 1.5 to 2.0 inches in thickness. The core shroud performs three primary functions. First, it directs the incoming feedwater down and along the reactor vessel's wall, and then up through the reactor's core. Second, in addition to supporting the reactor's top guide and core plate, the core shroud also maintains the reactor's core geometry under normal operations. Finally, the shroud provides a refloodable space that could help protect the core from damage during an accident.[1]

Core Shroud Cracking

Table 1 is a compilation of core shroud inspection data received by the NRC from BWR operators. The primary locations for intergranular stress corrosion cracking in the core shroud are along the nine circumferential weld lines shown in figure 2. Figure 3 demonstrates that cracks in the core shroud are directly linked to the aging process. In BWRs in commercial operation for fewer than 20 years, core shroud cracking is rare. After 20 years, moderate to extensive cracking is the rule rather than the exception.

[1] For further details on the role of the core shroud and other BWR internal components, see Nuclear Regulatory Commission, *Boiling-Water Reactor Internals Aging Degradation Study*, NUREG/CR-5754, September 1993.

Introduction

Since 1978 no new nuclear reactors have been ordered in the United States, and plant orders placed between 1973 and 1978 have been canceled. Today, the US nuclear power industry is trying to survive by finding ways to extend the useful life of existing nuclear power plants another 20 years beyond their initial 40-year license period. This is an outdated strategy, and one that the Nuclear Regulatory Commission's own nuclear plant aging research program severely discredits.

Research has shown that a multitude of both large and small nuclear plant components are susceptible to a staggering variety of aging mechanisms. Reactor vessels, steam generators, piping, valves, heat exchangers, pumps, motors, instrumentation, electrical cables, seals, and supports are all degraded by erosion, fatigue, corrosion, radiation and thermal embrittlement, and vibration.

Studies have also demonstrated that some types of degradation cannot be detected using the established methods of periodic testing and inspection. Furthermore, in some cases no known methods exist for detecting the degradation. In-service failures in BWRs are thus inevitable.

To date, the single most significant finding resulting from the NRC's research program is that the essential conditions that produce stress corrosion cracking—including corrosion-susceptible materials, a corrosive environment, and tensile stresses—are *all* present in BWRs. So far, most of the documented cracking has been found in one component, the core shroud. But 18 other BWR internal components are also known to be susceptible to stress corrosion cracking. In all, 21 major BWR internal components are susceptible to corrosion, fatigue, creep, embrittlement, and erosion, or to a combination of these degradative mechanisms.

Other worrisome NRC findings include the following:

- Most BWRs experience core shroud cracking after only 20 years of operation—not 40 or 60.
- The synergistic effects of multiple degraded components is still a largely unexplored but critical aspect of the BWR aging cycle.

The Genesis of the Problem

In a January 4, 1994, internal memorandum (cited on page 1 of the attachment to SECY-94-276, dated Nov. 10, 1994), the NRC declared core shroud cracking in BWRs to be "an emerging technical issue." Since that date, the NRC has focused on core shroud cracking as a safety issue, and industry officials have busied themselves looking for reliable ways to find the cracks and then develop a technical fix for the problem. This approach, however, is not so much wrong as it is seriously incomplete.

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Figue 1

BWR INTERNAL COMPONENTS

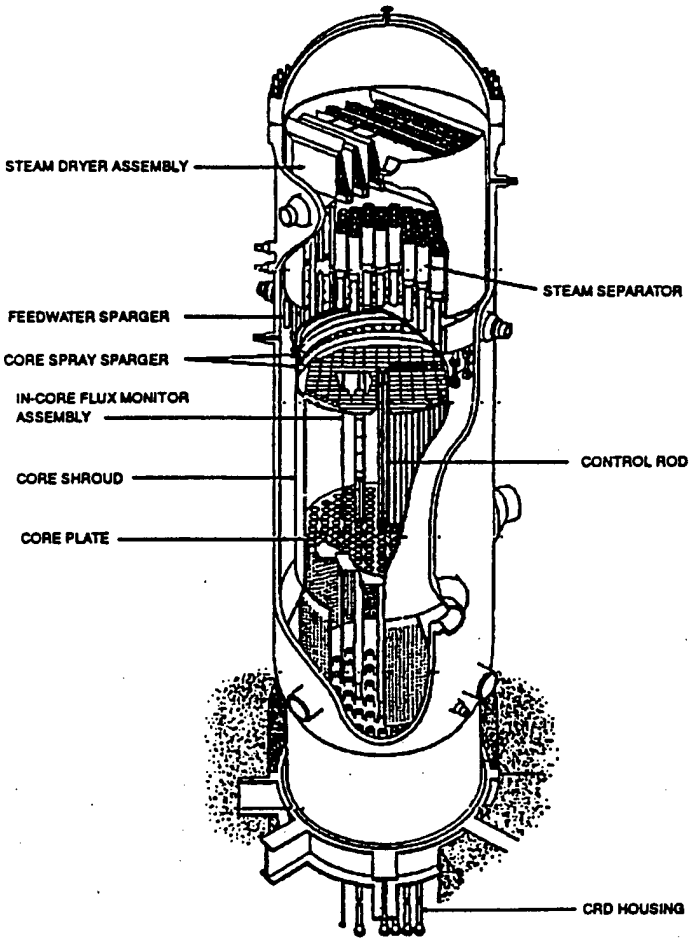


Table 1

SUMMARY OF NRC DATA ON CORE SHROUD CRACKING

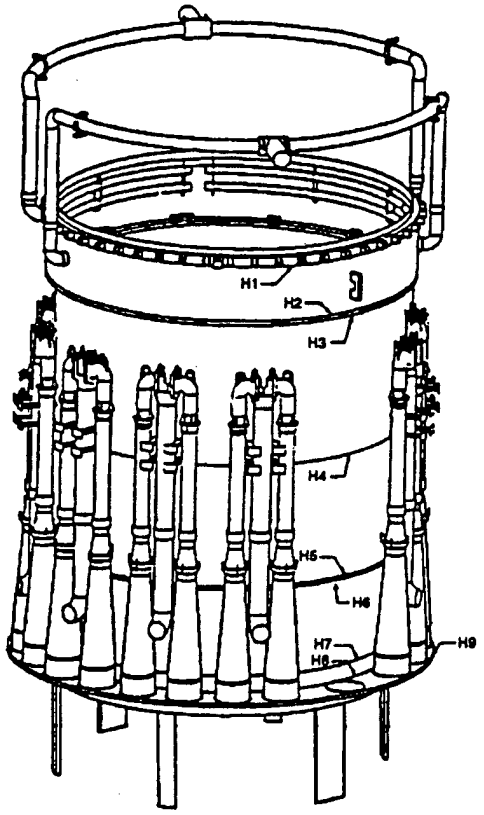
Plant	Type	Commercial Operation	Last Inspection	Summary
Brunswick 1	MK 1 BWR-4	3/18/77	10/93	Inspection found extensive cracking. Repairs have been implemented.
Brunswick 2	MK 1 BWR-4	11/3/75	5/94	Inspection found extensive cracking. Repairs have been implemented.
Peach Bottom 2	MK 1 BWR-4	7/5/74	9/94	Moderate cracking found without significant degradation of shroud structural integrity.
Peach Bottom 3	MK 1 BWR-4	12/23/74	11/93	Minor circumferential and axial cracking found.
Nine Mile Pt 2	MK 2 BWR-5	3/11/88	11/93	Inspection found no cracking.
Vermont Yankee	MK 1 BWR-4	11/30/72	10/93	Inspection found no cracking.
Millstone 1	MK 1 BWR-3	3/01/71	1/94	Minor circumferential cracking found.
Hatch 2	MK 1 BWR-4	12/31/75	4/94	Inspection found moderate cracking.
Oyster Creek	MK 1 BWR-2	12/1/69	10/94	Inspection found extensive cracking. Repairs have been implemented.
Dresden 3	MK 1 BWR-3	11/16/71	4/94	Inspection found extensive cracking. A safety evaluation justified continued operation for 15 months without repair.
Quad Cities 1	MK 1 BWR-3	2/18/73	4/94	Inspection results similar to Dresden 3. The Dresden 3 safety evaluation covered Quad Cities continued operation for 15 months.
Fermi 2	MK 1 BWR-4	1/23/88	6/94	Inspection found minor axial cracking.
Monticello	MK 1 BWR-4	6/30/71	10/94	Inspection found minor circumferential cracking.
Duane Arnold	MK 1 BWR-4	2/01/75	9/93	Inspection found no cracking.
Hope Creek	MK 1 BWR-4	12/20/86	3/94	Limited inspection found no cracking.
LaSalle 1	MK 2 BWR-5	1/01/84	5/94	Inspection found no cracking.
Perry 1	MK 3 BWR-6	11/18/87	5/94	Inspection found no cracking.
Susquehanna 1	MK 2 BWR-4	2/12/85	12/93	Inspection found no cracking.
WPN-2	MK 2 BWR-5	12/13/84	6/94	Limited inspection found no cracking.

Source: *NRC Report to Congress on Abnormal Occurrences for October–December 1994*, March 1995

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Figure 2

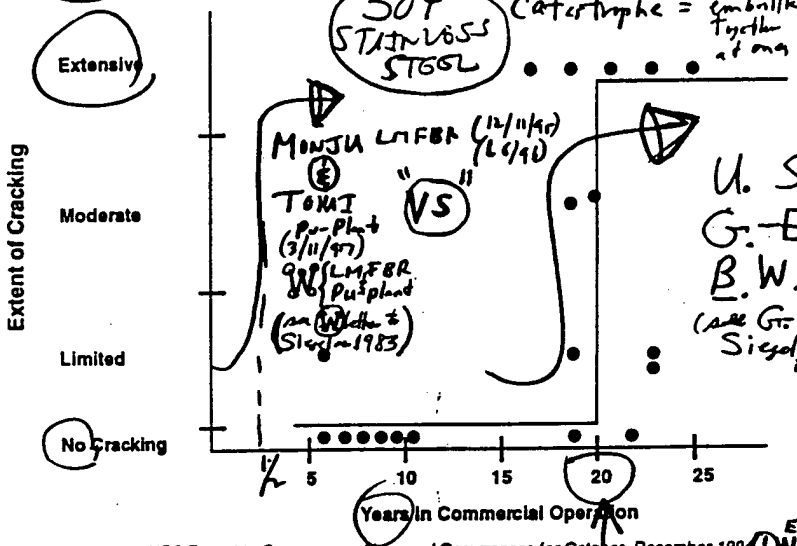
CORE SHROUD WELD LOCATIONS



Source: NRC Generic Letter 94-03, July 25, 1994

Figure 3

SUMMARY OF NRC DATA ON CORE SHROUD CRACKING



Source: Data from *NRC Report to Congress on Abnormal Occurrences for October–December 1994*, March 1995

The Core Shroud in Context

In its March 15, 1995, *Report to Congress on Abnormal Occurrences for October–December 1994*, the NRC called BWR core shroud cracking "the most significant concern related to potential failure of reactor internals reported during 1993 and 1994." Although cracks in the core shroud have deservedly received a good deal of attention in recent years, it is crucial to keep a systemwide perspective. Core shroud cracking is indeed a very serious problem but, more important, it is a harbinger of even more widespread future crises. As the BWR fleet continues to age, component failures will become more and more commonplace. The current core shroud crisis should be thought of as a wake-up call rather than an opportunity to find and apply a technological quick fix.

Table 2 (on page 8) puts the core shroud into a far more meaningful perspective. The core shroud is but one internal component among many that will fail with passage of time, this table underscores the dangers associated with ad-

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shroud apart from its larger BWR context. The core shroud may be the first internal failure to come to the attention of state, NRC, and industry officials, but it will surely not be the last.

As shown in table 2, 19 of the 21 BWR internal components listed are susceptible to stress corrosion cracking, including irradiation-assisted intergranular stress corrosion cracking. In addition, eight components are vulnerable to fatigue failures. Embrittlement is a potential aging-related degradation mechanism for four components, and erosion causes degradation in two components. Finally, five internal components are susceptible to the effects of creep.

Synergistic Effects

Significantly, in addition to the core shroud, 10 other internal components listed in table 2 are susceptible to two or more aging-related degradation mechanisms. In the past two years, NRC and industry officials have worked long and hard to accumulate a spattering of data concerning how and why the core shroud is cracking, and what to do about it. But to date, little is known for sure about the synergistic effects of the degradation and failure of one internal component as it interacts with others. Rather conservative speculation, however, would raise the following domino-like risks:

- The force of escaping water from a ruptured pipe could cause a nearby, previously cracked component—such as a top guide—to fail and thereby prevent the insertion of control rods, which in turn would stop the reactor's shutdown
- The failure of *any* component listed in table 2 could very well block the flow of water within the core, resulting in a localized melting of the reactor's fuel

Even under ideal conditions, detecting damaged internal components is an uncertain task. Access to the components is limited, and inspection techniques, visual and ultrasonic alike, are not 100 percent accurate. What is certain, however, is that with the passage of time the five degradation mechanisms and the 21 internal components listed in table 2 will interact with one another in surprising and unpredictable ways.

Reactor Repairs: The State of the Art

The Core Shroud

What does it take to repair a cracked core shroud in terms of cost, plant down time, and technology availability? According to the February 6, 1995, issue of *Inside NRC*, MPR Associates, based in Alexandria, Virginia, has developed a recently patented core shroud repair method, which consists of a series of 10 vertically mounted tie-rods applying axial compression to a cracked shroud. MPR charges between $500,000 and $1 million to inspect a core shroud, and $3 million to $4 million to install the tie-rods. The repair reportedly takes about 10 days.

Table 2

BWR INTERNAL COMPONENTS AND POTENTIAL AGING-RELATED DEGRADATION MECHANISMS

Component	SCC[a]	Creep[b]	Fatigue[c]	Embrittlement[d]	Erosion[e]
Steam dryer			●		
Steam separator	●			●	●
Shroud head	●				
Shroud head bolts	●				
Steam separator support ring	●				
Top guide	●	●			
Access hole cover	●				
Core shroud	●	●			
OFS piece	●	●		●	
Core plate	●				
Core spray line internal piping	●				
Core spray sparger	●		●		
Feedwater sparger	●		●		
Jet pump	●		●	●	●
In-core neutron flux monitor housings	●		●		
In-core neutron flux monitor guide tubes	●		●		
In-core neutron flux monitor dry tubes	●	●	●		
CRD housing	●				
Neutron source holder	●				
Jet pump sensing line			●		
Control blade	●	●		●	

Source: *Boiling-Water Reactor Internals Aging Degradation Study*, NUREG/CR-5754, September 1993

[a]**Stress Corrosion Cracking.** SCC refers to the weakening of a BWR internal structural component because of deterioration caused by electrochemical reactions with the surrounding material.

[b]**Creep.** The progressive deformation of a structure under constant stress is known as creep.

[c]**Fatigue.** As a structure vibrates in response to dynamic loads, cracks develop in certain BWR internal components.

[d]**Embrittlement.** Exposure of internal components to high temperatures (thermal embrittlement) and prolonged exposure to fast neutron fluxes (radiation embrittlement) make a material more brittle and vulnerable to cracking.

[e]**Erosion.** The abrasive effects of bubbles and droplets in a liquid flow can weaken BWR internal components.

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Other Internal Components

The readiness of the industry to meet projected maintenance and repair challenges that lie ahead is unclear. A rough measure of the nuclear industry's level of readiness to manage the full range of problems associated with aging BWRs is found in a June 1994 report of the Boiling Water Reactor Owners Group. As indicated in table 3, more than half of the internal components in a BWR are classified as readily repairable. But, for 12 of 29 components (bolded below), repair methodologies were still in the conceptual phase of development.

Table 3

OTHER REACTOR INTERNALS REPAIR OPTIONS

Component	Repair Capability
Shroud support	N
Jet pump	C
Control rod drive	R
Control rod guide tube	R
Control rod drive housing/stub tube	Y
In-core housing	Y
Head cooling spray nozzle	R
Core delta pressure and liquid control line	C
LPCI coupling	N
Core spray line	Y
Jet pump riser brace	Y
Orificed fuel support	R
Access hole cover	Y
Top guide	C
-Keeper	C
-Bolt	C
-Wedge	C
-Aligner	C
Core plate	C
-Bolt	C
Shroud	Y
Core spray sparger	Y
Dry tube	R
Reactor Vessel Attachments	
Steam dryer hold down bracket	X
Steam dryer support bracket	X
Guide rod bracket	X
Feedwater sparger	X
Core spray line bracket	X
Surveillance capsule holder bracket	N

Y = local repair or replacement available
N = no repair developed to date
R = replaceable component
C = conceptual repair (design of hardware and installation tooling not complete)
X = hands-on repair possible after lowering vessel water

Source: NRC/BWROG meeting materials, June 28, 1994

Looking Toward the Future

Faced with long-term economic and technological uncertainty, the BWR community—owners, suppliers, and regulators at all levels of government—can no longer afford a myopic, short-term view of the future. Indeed, Ivan Selin, then-departing chairman of the NRC, warned in a May 9, 1995, address that reactor aging will require a major, continuous effort by industry officials to anticipate emerging aging-related problems and to resolve them before they become a crisis.

A comprehensive analysis of the BWR aging problem, taken as a whole, is a good place to start. Such a plan must include:

- a complete technical feasibility study of the life-cycle of each and every BWR internal component subject to failure. Knowing that 60 percent of the components can be repaired, given the state of the art, is not good enough;

- a detailed, component-level economic strategy to guide state regulatory decisions about when a BWR is economically repairable, and when it is beyond repair.

The nuclear industry can no longer afford, technically or financially, to muddle forward into the 21st century. The most important way for the BWR community to begin today to make better decisions tomorrow is to deal with the whole problem of aging-related degradation.

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(12/10/95)

Monju may have leaked 3 tons of liquid sodium

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FUKUI (Kyodo) Officials operating the prototype fast-breeder nuclear reactor Monju that was shut down Friday said Saturday that between 2 and 3 tons of liquid sodium leaked from a cooling system, but the source of the leak has not yet been found.

Antinuclear activists said the leak exposes the main weakness in the nation's fast-breeder program.

Officials with the semipublic Power Reactor and Nuclear Fuel Development Corp. said technicians had to wait for smoke caused by a reaction between sodium and moisture in the air to dissipate before they could enter the room where the leak is suspected to have occurred.

Workers shut down the plant at 9:20 p.m. Friday after an alarm went off at 7:47 p.m. indicating of a temperature abnormality in a sodium pipe in the secondary cooling system.

PNC reacted immediately and set up an emergency task force with Yasutami Omori, director of the nuclear plant, as its chief, the officials said.

Workers drained off about 80 tons of liquid sodium into a tank to prevent any spread of the effects of the accident.

According to PNC's investigation, an alarm in the central control room indicated a leak of sodium one minute after fire alarms went off in a piping room.

Several workers wearing oxygen tanks went to check the piping room and found piles of oxidized sodium on the stainless-steel floor below the pipes carrying the coolant, but were unable to locate the precise spot from where the liquid was leaking, PNC said.

Although it is not clear where the leak occurred because the piping is covered with insulation and paneling, piping near where leaked sodium was found to have solidified was repaired in 1991, the officials said.

The repair might have compromised the overall evenness in the strength of the piping and lead to the leak, they said.

Antinuclear activists said Friday's accident proves the theory that sodium leaks are the weakest point in fast-breeder reactors, and it appears likely that there will be more calls questioning the safety of Monju.

Jinzaburo Takagi, representative of the Citizen's Nuclear Information Center, said, "It is a fatal defect that the reactor must use sodium as its coolant."

About 20 representatives from Takagi's organization and other citizens' groups visited PNC's headquarters in Tokyo on Saturday to hand out a statement urgently requesting that the Monju project be halted.

Kazuharu Kawase, mayor of Tsuruga in the coastal prefecture of Fukui, where the 280,000-kw Monju is located, visited the plant Saturday morning to hear an explanation of what had gone wrong from officials in the plant's central control room.

The Fukui Prefectural Government later summoned Tadayoshi Suda, PNC's vice director general, and issued a formal protest stating, "It was a grave accident that questions the assurances of Monju's safety."

Prefectural officials requested that PNC thoroughly investigate the incident and reconsider its schedule for tests before the plant begins full-scale operations, slated for as early as June.

The officials said it took about one hour for PNC to file the first report on the accident with the prefectural government, criticizing the corporation for the delay.

PNC representatives expressed their apologies to local residents.

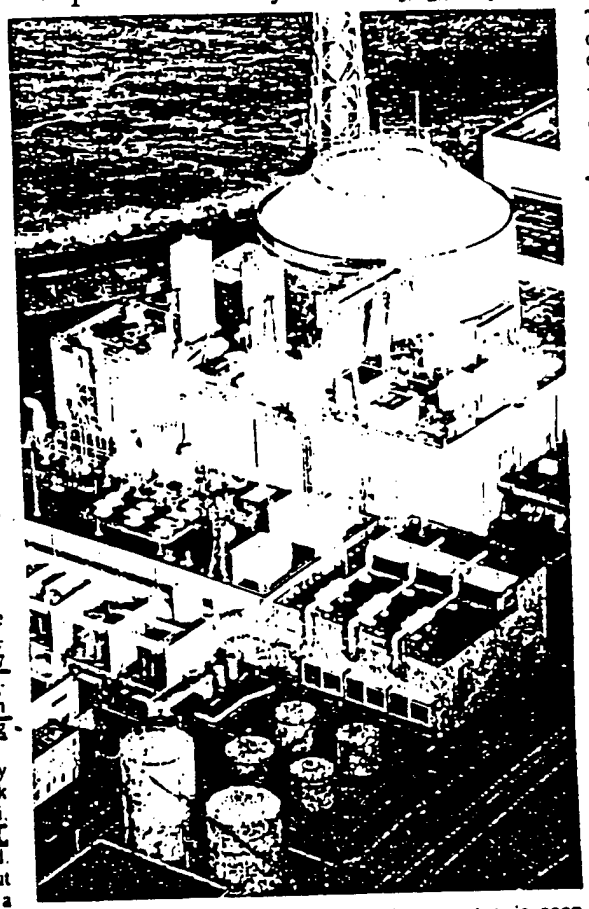
A nearby resident who operates an inn said he felt uneasy knowing the plant had failed to inform resident about the accident.

"I can't say anything until the results of the checks are known," he said. "I can't stay here if I can't trust it."

Although a sodium leak is considered a technically serious problem for the fast breeder reactor, the corporation insisted Friday that there had been no radioactive damage to the environment as result of the accident.

Monju started producing electricity in August and slated to begin operating full-capacity next June, was operating at 40 percent capacity at the time of the i

CONTINUED ON PAGE 2



MONJU, Japan's first fast-breeder nuclear reactor, is seen Saturday morning after it was shut down following a leak of liquid sodium the night before. KYODO PHOTO

y to indict former President Chun

Choi said prosecutors were investigating allegations that heads of major corporations had given Chun money during his term in office.

Choi won't talk

SEOUL (Reuter) Former South Korean President Choi Kyu Hah refused on Saturday to answer a prosecution request to appear for questioning over a 1979 coup and later massacre of civilians at Kwangju, the domestic Yonhap news agency said.

"As a former presi

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Mr. Choi feels he should not have to be summoned," Lee Ki Chang, Choi's lawyer, was quoted by Yonhap as saying.

"He has previously answered written questions about this matter so he doesn't feel obliged to go to prosecutors' office."

Strike closes train service via Chunnel

PARIS (Reuter) A strike b French rail workers close down all Eurostar high spee trains through the Chann Tunnel between Paris, Lo don and Brussels on S

The Japan Times

Thursday, March 13, 1997

5TH EDITION ¥160

35 people were exposed to 'small' radiation leak

Hashimoto angered by tardy PNC reports

At least 35 people were exposed to an "extremely small dosage" of radioactivity Tuesday in Japan's worst radiation leakage accident, officials said Wednesday.

The exposure occurred after an explosion followed a fire at a nuclear fuel reprocessing plant in Tokai, Ibaraki Prefecture.

The blast occurred at 8:14 p.m. at a spent nuclear fuel reprocessing facility run by [redacted] PNC. It destroyed windowpanes and two steel shutters of the four-story building, the officials said.

White smoke billowed from [redacted] and alarm in the facility rang immediately after the explosion, they said.

One radioactivity monitoring post near the building showed an increase in radioactivity of 20 percent at 8:50 p.m. but normal readings after 9 p.m., indicating that a small amount of radioactive dosages had leaked outside, they said.

There was no radioactive pollution threat to residents near the facility, they claimed.

There were no workers in the building when the explosion occurred, and 42 people who were working in a building next to the facility were safe, the officials said.

Ten hours earlier, a small fire broke out in a building where low-level liquid nuclear waste and high-tempera[redacted] packed into drums. The fire was extinguished 14 minutes later, they said.

However, no one confirmed the temperature inside the building after the fire was extinguished, sources involved in the investigation said.

Further, the PNC neglected to sound the alarm publicly, even though the plant was aware that radiation warnings were activated after the fire, they said.

The 35 workers present at the time of the fire inside the facility were found to have been exposed to an extremely tiny dosage of radioactivity, the PNC officials claimed.

They said the maximum bodily irradiation suffered was 2,700 becquerels, less than two-thousandths of the admissible maximum annual intake.

On Wednesday, Prime Minister Ryutaro Hashimoto apologized, saying "the accident and its handling created a situation that prompted the nation to have more anxiety than necessary."

He voiced concern that the PNC failed to report promptly and accurately to the Science and Technology Agency.

PNC President Toshiyuki Kondo offered an apology over the accident during a visit to the agency.

"This is my intuition at this moment, but we were lax at making precise decisions (in handling the accident)," Kondo told a news conference.

Chief Cabinet Secretary Seiroku Kajiyama also apologized for the accident, saying it must have raised concern among the public over the safety of nuclear reactors.

"It is truly regrettable that the accident raised concerns among local residents (in Ibaraki Prefecture) as well as the people in the nation," the top government spokesman said at a news conference.

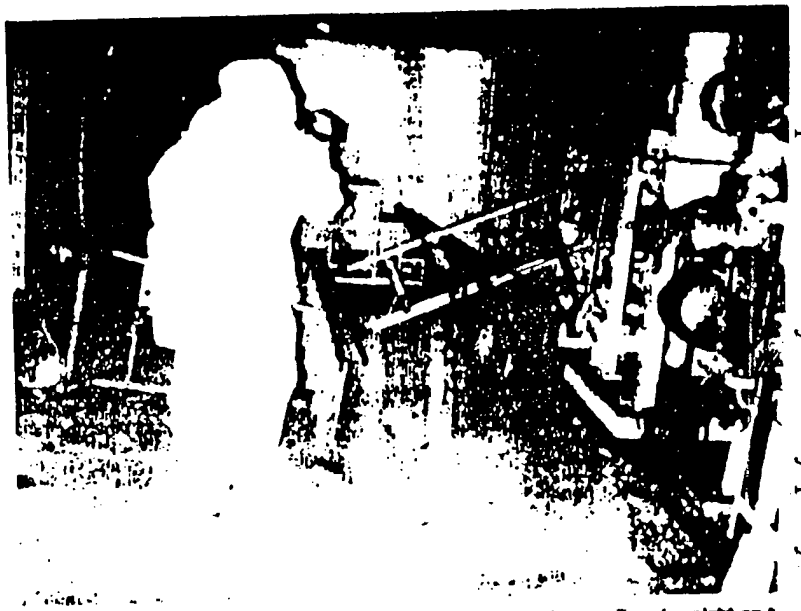
He said the government will make every effort to find out the cause of the accident and prevent a recurrence.

Kajiyama slammed the PNC for its handling of the accident.

If the PNC had tried harder to find out the cause of the fire immediately, the explosi that occurred some 10 ho later could have been p vented, he said.

The PNC should inform public of an incident — eve

CONTINUED ON PAGE 2



TOKAI, Ibaraki Pref. — A worker in protective gear examines damage Tuesday night on t second floor of a state-run nuclear reprocessing plant where an explosion occurred earlier the evening. PNC PHOTO

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Criminal charges sought against PNC, officials

The Science and Technology Agency filed a complaint Wednesday against the Power Reactor and Nuclear Fuel Development Corp. (PNC) and three of its officials, urging police to investigate the falsification of a report in connection with the country's worst-ever nuclear accident, agency officials said.

It is the first time for the agency to lodge an accusation under a law that makes it an offense to falsify reports on nuclear plant accidents.

If convicted, the PNC officials could face fines of up to ¥200,000.

"I am sorry that the accident caused concern and anxiety among the general public, and it's regrettable to arrive at a situation such as this," agency chief Riichiro Chikaoka said at a news conference prior to filing the complaint with Ibaraki Prefectural Police.

The accident occurred last month at the nation's only reprocessing plant for spent nuclear fuel. It is located at Tokai, Ibaraki Prefecture.

"This is an issue related to Japan's nuclear and energy policies as a whole, so I believe that we must uncover and convey the real facts of the matter to the general public first," he said, adding that "we have taken a resolute attitude, which is what the government agency with jurisdiction must do with regard to the case."

PNC President Toshiyuki Kondo again apologized for the falsified accident report and pledged to cooperate with Ibaraki police in their investigation.

Chikaoka's announcement came one day after agency officials wrapped up a two-day inspection of the Tokai nuclear fuel reprocessing plant in connection with the alleged falsification of a report on a fire there on March 11. The fire was followed later in the day by an explosion.

About 20 plant workers and managers were questioned about the false report on the accident, which left 37 workers exposed to radiation. Fifteen PNC officials, including five employees of a PNC subcontractor, were aware of the false report, according to the PNC.

The Tokai case was followed Tuesday by revelations of another scandal, with the PNC this time failing to promptly report a radioactive leak that occurred at the Fugen advanced thermal converter reactor in Tsuruga, Fukui Prefecture.

The Fugen case is the third accident involving a PNC facility in less than 18 months, adding fuel to the debate over how to reform PNC.

Prime Minister Ryutaro Hashimoto reiterated support for reforming the PNC.

"The nature of the problem at the PNC must be scrutinized thoroughly regardless of the question of whether it should be privatized," Hashimoto told reporters.

Chief Cabinet Secretary Seiroku Kajiyama expressed regret that the Fugen report was delayed and joined Hashimoto in stressing the r to review the PNC.

"I feel the deepest re The characteristics and nization of the PNC, whic peatedly acts in this fa must be reviewed with ing off limits, and with ingness to dissolve the that's what's needed to a fresh start," Kajiyar a news conference.

The power industry cerned that the nation clear power program suffer a setback follow legal action taken aga PNC.

Kazunao Tomon, vic dent of the Federa Electric Power Cor commented Wedne it is regrettable that has been beset by a accidents and that make appropriate

An industry sour that, unlike proto tors, reactors use companies are so source conceded th cidents will have effect on Japa power program.

The source ad PNC's operation transferred to at a time when in electricity co ing.



RIICHIRO CHIKAOKA, director general of the Science and Technology Agency, faces report at his agency Wednesday to announce that police have been asked to act against Po Reactor and Nuclear Fuel Development Corp. over false reports about accidents at the fir nuclear facilities and attempts to cover up the falsified information.

11 exposed to radiation in Fugen leak

FUKUI (Kyodo) Eleven workers at the Fugen prototype advanced nuclear reactor in Tsuruga, Fukui Prefecture, were exposed to small amounts of radiation when it developed a tritium leakage Monday, officials said Wednesday.

The Fukui prefectural labor standards bureau and the Tsuruga labor standards inspection office said they received reports on the minor radiation exposures Tuesday evening from the operator of the reactor, the state-run Power Reactor and Nuclear Fuel Development Corp. (PNC).

The reports said the amount of radiation the workers were exposed to was within permissible limits.

On Wednesday, Science and Technology Agency sources said Fugen may have to be decommissioned following last month's fire and explosion at Tokai, Ibaraki Prefecture, which led to the shutdown of a spent nuclear fuel reprocessing plant.

The Fugen plant has no further capacity to store spent nuclear fuel and an indefinite halt of operations is inevitable. The Science and Technology Agency has already issued an order for the facility

CONTINUED ON PAGE 2

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Tokyo halts high-level dialogue with Iran

Japan will suspend high-level dialogue with Iran "for the time being" but has no immediate plan to recall its ambassador to Tehran, Foreign Minister Yukihiko Ikeda said Tuesday.

Ikeda said the decision is in response to a German court ruling last week that top Iranian leaders were behind the 1992 murder of four Kurdish dissidents in Berlin.

Iran has repeatedly denied any role in the killings, blaming them on infighting between opposition groups.

Ikeda made the remarks at a regular morning news conference after the day's Cabinet meeting.

Tokyo holds annual meetings of high-level officials with Tehran, and the next such talks were scheduled to take place in May.

The foreign minister said Japan will not immediately follow moves by European Union members, except Greece, to recall their envoys to Iran for consultations, saying Tokyo will keep its normal dialogue channels open with Tehran.

Later in the day, Seiichiro Noboru, director general of the Middle Eastern and African Affairs Bureau, explained Japan's decision to Iranian Ambassador Manouchehr Mottaki at the Foreign Ministry.

Noboru told Mottaki that the relationship between Japan and Iran is important and that Japan believes it is wrong to isolate Iran, Foreign Ministry officials said.

Noboru said Japan is not considering cutting all channels for dialogue but that it will suspend high-level dialogue such as vice ministerial-level talks, the officials said.

Mottaki did not respond directly to Japan's decision, saying he will relay the decision to the Tehran government, according to the officials.

Mottaki told Ikeda that the German court's ruling is unacceptable because it is politically motivated, the officials said.

The German court ruling has led to swift reaction from the international community, with Canada, Australia and New Zealand as well as most EU member states either recalling or planning to recall their envoys to Iran.

Tokyo may come under

CONTINUED ON PAGE 4

PNC slow to report latest nuclear leak

Tritium escapes from Fugen reactor

FUKUI (Kyodo) The Power Reactor and Nuclear Fuel Development Corp. failed to report to prefectural authorities on a leakage of radioactive substances Monday at the Fugen advanced thermal converter reactor in Tsuruga, Fukui Prefecture, until 30 hours after the accident, it was learned Tuesday.

The Science and Technology Agency ordered the PNC to shut down operations at Fugen, investigate the case and thoroughly review the system of information flow in the event of an emergency.

Officials at Fugen said the reactor automatically stopped around 10:30 p.m. Tuesday, before the agency told them to shut down. The officials said they are investigating why the reactor halted automatically.

The agency, meanwhile, has decided to file a complaint against several PNC officials today over a falsified report on Japan's worst nuclear accident last month at the nuclear fuel reprocessing plant in Tokai, Ibaraki Prefecture, agency sources said.

The sources said the agency will file the complaint with Ibaraki Prefectural Police over the PNC officials' alleged violation of the nuclear reactor regulations law.

Science and Technology Agency chief Riichiro Chikaoka summoned PNC President Toshiyuki Kondo to the agency on Tuesday and ordered the institution to improve its crisis management system.

Chikaoka also complained to Kondo about the slow handling of the accident at Fugen.

The latest blunder at Fugen is sure to pose more problems for the PNC, which is already being criticized for falsifying information on a fire and explosion on March 11 at the Tokai plant, analysts said.

"Our report was delayed because of our misjudgment. I am sorry for causing trouble," said Norito Takeshita, head of the Fugen nuclear power station, during a news conference Tuesday.

Prime Minister Ryutaro Hashimoto expressed anger at the PNC's latest flap.



TOSHIYUKI KONDO, president of the Power Reactor and Nuclear Fuel Development Corp., leaves the Science Agency Tuesday after reporting a tritium leak Monday at the nuclear reactor in Tsuruga, Fukui Prefecture. KYODO PHOTO

"Give me a break," he said.

According to Fukui Prefectural Government officials, an alarm sounded at about 5:30 a.m. Monday when a high level of the radioactive material tritium was detected in a vent of a facility at the Fugen reactor, which refines heavy water used to decelerate the speed of neutrons.

The density of tritium also increased within the facility, they said.

The PNC suspended operations at the facility and prevented ventilation until it confirmed the density of tritium had declined to normal levels again, around 9 p.m. Monday, they said.

The PNC found that about 100 cu. cm of heavy water had leaked from a pipe in the facility, but the deputy head of the Fugen reactor decided not to report the case to the agency — which oversees the nation's nuclear policy — and the prefectural government

because the concentr tritium had decreased site of the leakage ha identified.

However, the head o actor, who was on a t trip Monday, ordered port on the accident t leased to the prefec Tuesday.

The PNC finally i report at noon, abou after the tritium curred, the officials

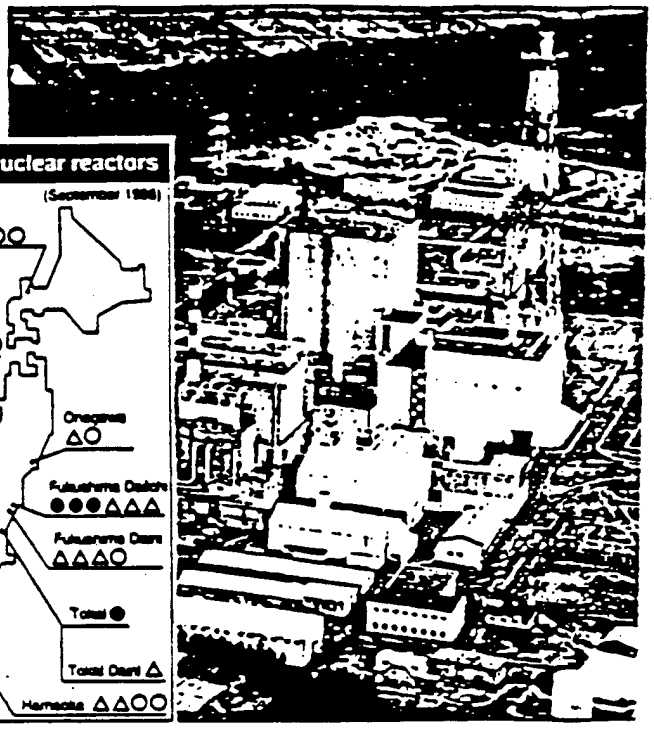
Because the volu leaked tritium is es have been one 3 mi millionth the annu level in normal the officials said t would cause no h environment arou ity.

According to th Fugen reactor h commercial oper 1979, providing re as well as a stea electricity to th utility companies

Reproduction clarity limited by quality of comment letter received.

ears old and obsolete, the Tokai nuclear plant is to be decommissioned. Motoya Kitamura reports

Pulling the plug



In the biological world, the old makes way for the new because living creatures have limited life spans. So do nuclear power plants.

Just as it ushered in the era of commercial reactors in Japan 30 years ago, the Tokai nuclear plant once again will step into unknown territory as it becomes the first reactor in Japan to be decommissioned, or permanently removed from service.

The plant, located in the village of Tokai, Ibaraki Prefecture, will cease operations by April 1998. Its nuclear fuel will be removed, a task that will take four to five years. The reactor will then be decontaminated and disassembled; all waste will be packed and removed.

The process could take up to 15 years.

Reactor decommissioning is a new process worldwide. According to the Ministry of International Trade and Industry, out of 60 "retired" commercial reactors with outputs larger than 30,000 kw, only three in the United States and one in Germany have completed the decommissioning process.

This is the 44th year since U.S. President Dwight D. Eisenhower's famous "Atoms for Peace" speech opened nuclear energy to non-military sectors in 1953, and the first generation of atomic plants have surpassed their life spans of 30 or 40 years.

Technologically, a nuclear plant can last for many years if reactor parts that have suffered from fatigue and contamination are repaired, as a study by MITI's Natural Resources and Energy Agency concluded in April.

But nuclear plants have shorter economic lives than technological ones.

"Any power plant, be it thermal or hydraulic, has a life span," said Yuichi Hayase, general manager of the nuclear power department of the Federation of Electric Power Companies. "It is determined by whether it is economically rational to maintain a plant or not.

"As nuclear plants have aged, their operation and maintenance costs have actually grown higher and higher."

Anticipating the coming age of nuclear plant decommissioning, the government and the energy sector have studied overseas cases, according to industry sources.

In the United States, high decommissioning cost estimates have added to rising operating and maintenance costs of nuclear plants. This phenomenon caused the power industry, highly conscious of production costs, to shift away from nuclear energy.

The result has been a halt in nuclear plant orders since 1978.

A U.S. congressional report in 1992 suggests that decommissioning costs in the United States are increasing rapidly.

To cope with future decommissioning costs, Japan in 1988 made it mandatory for nuclear power producers to reserve money for this purpose.

The government has estimated the decommissioning costs for each reactor capacity. JAPC says the estimate for the Tokai plant is ¥227 million.

Since the period for the financial reserve buildup is usually more than a decade, the seemingly prohibitive decommissioning costs are added to customers' bills.

Not everyone is worried about staggering costs.

"The decommissioning process costs less than 10 percent of the construction cost," said Naoto Sagawa, chief economist at the Institute of Energy Economics. "It won't make much impact on the economics of nuclear power projects as a whole."

But the estimated decommissioning cost does not cover the disposal of some of the low-level radioactive waste, because the government has yet to adopt a method.

The omission has fueled criticism.

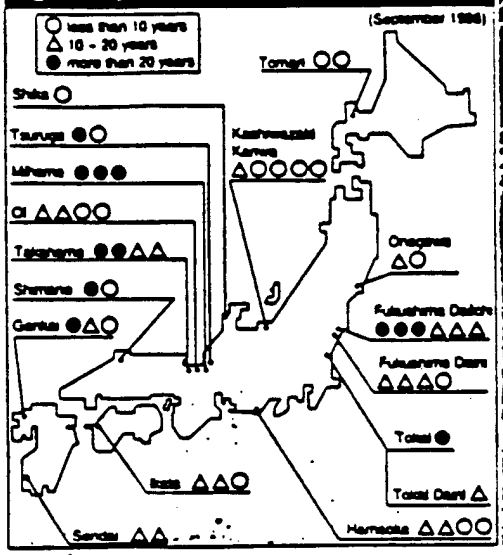
"The estimated ¥227 million is far from enough," said Baku Nishio of the Citizens' Nuclear Information Center, an anti-nuclear think tank. "Even doubling the budget to ¥454 million might not be enough because the cost for radioactive materials disposal is likely to be prohibitive beyond our imagination."

According to MITI's Natural Resources and Energy Agency, of the 200,000 tons of waste, including the structure, from decommissioning the Tokai plant, 20,000 tons will be low-level radioactive waste, most of which will be stored in a facility in Rokkasho, Aomori Prefecture.

High-level waste will not be produced, the agency says.

But there are 4,000 tons of nuclear waste that is neither high-level nor low-

Age of Japan's commercial nuclear reactors



used control rods — and the agency's Advisory Committee for Energy started discussions on its storage only in March.

"We have to wait until the government decides its waste disposal policy for us," a JAPC official said.

Said Hayase, "As long as the policy is not decided, we will not be able to calculate the aggregate cost for decommissioning nuclear plants.

"We also do not have the technological image of how a decommission is carried out. Information we have obtained so far is insufficient. We expect the Tokai plant will provide us with good data."

This is not the first time the Tokai plant and JAPC have served as guinea pigs — Tokai was the first commercial nuclear plant in Japan.

In 1957, the nuclear community — headed by political and business barons such as Matsutaro Shoriki, the first head of the Atomic Energy Commission and the Science and Technology Agency — chose a British-designed reactor.

Unlike widely used light-water reactors, the Tokai plant uses graphite as a moderator and carbon dioxide as a coolant.

"The British were one step ahead in commercial nuclear reactors at that time," said Sagawa of the Institute of Energy Economics. "They produced the best and cheapest plants."

Also in that year, the government decided to found JAPC, which would build and operate the British-designed reactor. At the time of its establishment, 42 percent of the company was owned by private utilities and 20 percent by the state-owned Electric Power Development Co.

Today, the private utilities hold a bigger share.

"The history of the Tokai plant is our company is that of our nation's nuclear energy," JAPC's corporate pamphlet says. "From now on, our mission is to study and execute the decommission measures. Dismantling nuclear power reactor in a safe and rational way is expected as a pioneer work."

The destiny of the decommissioned reactor seems secure: The government plans to build another plant at the same site.

But because the government does not have the prerogative to force firms to build new plants, the future of nuclear energy is basically dependent on the will of the private sector.

So far, the nation's private sector seems willing to continue its commitment to nuclear energy.

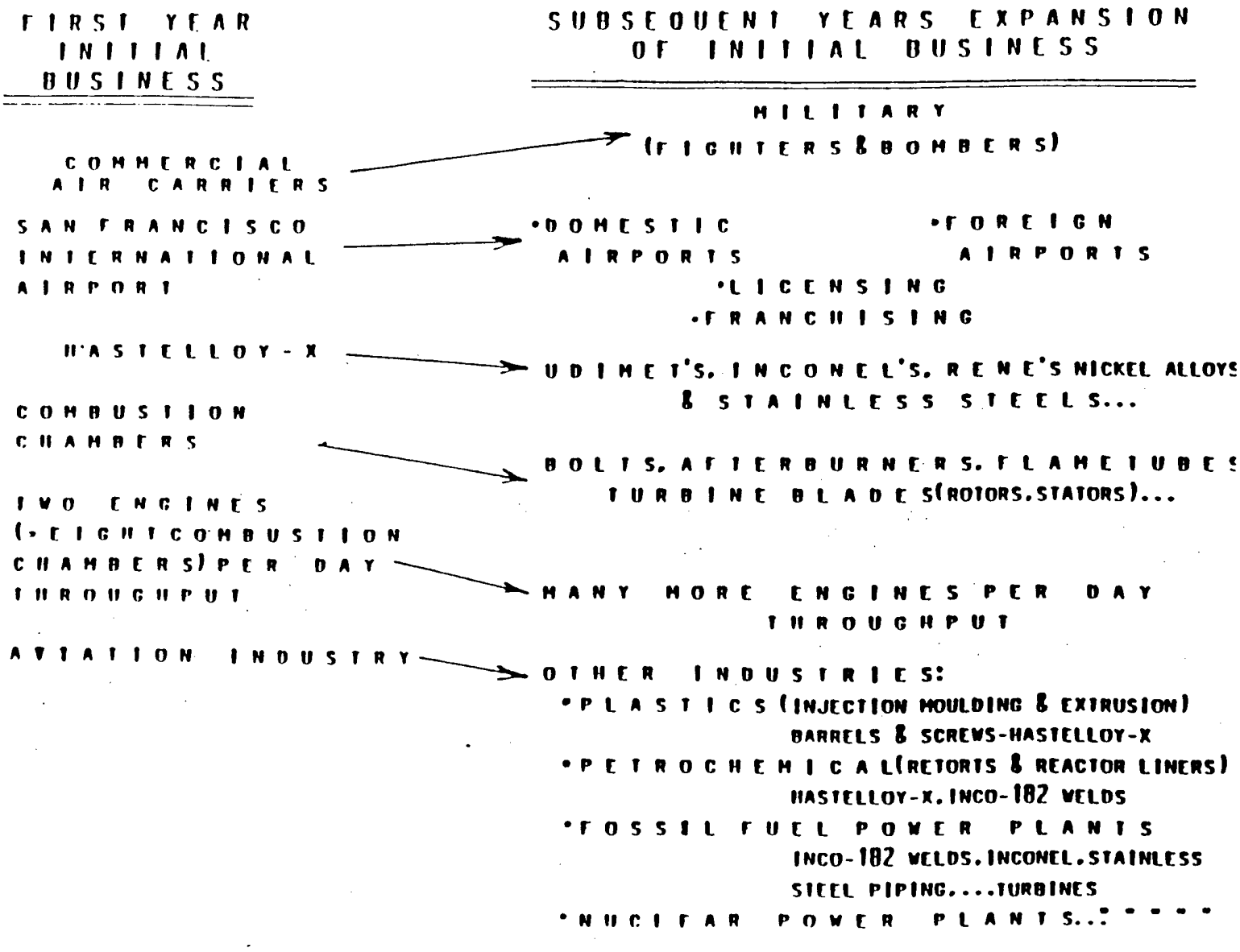
"If the prices of other energy sources stay relatively cheap, nuclear energy might prove too expensive in the future," Sagawa said. "But it is possible that the price of other energy sources could climb," making nuclear energy economical.

Added a JAPC spokesman, "Electric utilities are supposed to continue buying the electricity that our future nuclear plants produce."

But asked how nuclear power advocates could confront growing anti-nuclear sentiment in Japan, highlighted by the August plebiscite in Maki, Niigata Prefecture, Hayase said, "We want to view the issue of energy through a nationwide perspective. Energy is a matter over Japan.

"But I really don't have the ans-

MARKET EXPANSION



Reproduction clarity limited by quality of comment letter received.

Comment Number	Response

Dr. E. Seigel

I.63.1 As is stated in section 7.1.3 of the EIS, all features of Naval reactor design, operation, construction, maintenance, and personnel selection, training, and qualification have been oriented toward minimizing environmental effects and ensuring the health and safety of workers, ships' crew, and the general public. Conservative reactor safety design has, from the beginning, been a hallmark of the NNPP. Selection and use of the appropriate materials and components is inherent in the design of Naval reactors. Evidence of the success of the NNPP lies in its safety record: there has never been a reactor accident, or release of radioactivity having a significant effect on the environment, in the 50-year history of the Program. It is important to note that although some of the materials mentioned in the comment are used by the NNPP, the NNPP has not experienced the problems the commentor cites. This is due to different design and operation of Naval Reactors compared with commercial reactors.

I.63.2 Please see response to comment I.63.1 above.

I.63.3 Your comments are noted and are included in the Final EIS.

I.63.4 Your comments are noted and are included in the Final EIS.

I.63.5 The public hearing dates were to accommodate the extended public review period, and thus avoided the Jewish Holiday of Yom Kippur. There was no intent upon the part of the Navy to offend those of the Jewish faith. Your comments are noted and are included in the Final EIS.

I.63.6 Your comments are noted and are included in the Final EIS.

I.63.7 Our publicly-elected U.S. Congress and President of the United States make programmatic decisions regarding Naval ships (e.g. application of nuclear power), and thus comments regarding these decisions are beyond the scope of this EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

I.63.8 Please see response to comment I.63.1, and response H.1.1-5 for responses to Congressman Filner's testimony.

Mr. Grant Kimball
P.O. Box 23091
San Diego, CA 92123

November 11, 1998

Certified Mail
P 413 693 762

Mr. John Coon
Southwest Division (Code 05AL JC)
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

RE: Comments on Navy E.I.S. for Nuclear Aircraft Carriers

Dear Mr. Coon:

I.64

I am writing to register my dissatisfaction with the Navy's Environmental Impact Statement (EIS) for homeporting at least three (3) nuclear-powered aircraft carriers in San Diego. The Navy's EIS is inadequate and misleading, because it discounts the risk which is associated with locating several large nuclear reactors within two (2) miles of downtown San Diego. I.64.1

The Navy is using a misleading and self-serving definition of "reactor accident" to dupe the public into believing that the Navy has never experienced a "reactor accident." I have never seen an official definition of the term "reactor accident" in any Navy record or document. Despite the lack of an official Navy definition, an Associate Director of the Naval Nuclear Propulsion Directorate, Mr. Richard Guida, defined the term "reactor accident" in transcribed testimony before the Coronado City Council on April 9, 1996. Mr. Guida was the Associate Director for Regulatory Affairs, and testified about reactor accidents as follows:

> "We have a long history of safe operation and I want to explain, because there has indeed been some misunderstanding of what we mean when we say safe operation. We have 4,600 reactor years without a reactor accident. We have never claimed not to have accidents or incidents. What we have claimed is never to have had a reactor accident. What a reactor accident is, is a term of art in the nuclear industry; it means damage to nuclear fuel and release of what are called fission products. . . . Again, damage to the fuel, release of fission products. We claim we have had none over the history of the program, and that's 4,600 years." (See Enclosure 1, a copy of Mr. Guida's testimony.)

According to Mr. Guida's definition, what the Navy defines as a "reactor accident" is known to the rest of the world as a "nuclear core meltdown" What the Navy is really saying is that they claim not to have had any nuclear meltdowns. The Navy persists in this claim despite the fact that an active duty Navy enlisted man, and two Army enlisted men, were killed in 1960 when they caused the SL-1 reactor to explode by accidentally inducing a prompt critical condition, which led to a steam explosion, massive damage to the nuclear fuel, and radioactive contamination over a wide area. This accident was classified "secret" at the time it occurred, and is still largely unknown by the general public. I.64.1

According to the Navy's definition, the Navy will not classify as a "reactor accident" any event that involves the accidental release of radioactive water into the harbor, or radioactive steam or gases into the atmosphere, as long as the nuclear fuel remains intact.

In contrast to the Navy, the Department of Defense (DOD) does have a written definition of a "reactor accident". The DOD definition differs considerably from that used by the Navy. The DOD definition is contained in DOD Policy Document 5230.16, dated December 20, 1993, available on the Internet at: http://web7.whs.osd.mil/text/d523016p.txt. The DOD definition of a reactor accident is as follows:

> 22. Nuclear Reactor Accident. An uncontrolled reactor criticality resulting in damage to the core or an event such as the loss of coolant that results in significant release of fission products from the reactor core. (Emphasis added. See Enclosure 2, a copy of the DOD definition.)

The significant difference in the DOD definition is that events such as spilling radioactive water can be classified as "reactor accidents." According to the Navy definition, spilling radioactive water will never be classified as a "reactor accident", regardless of how much radioactivity is released into the environment.

Since the Navy is a subordinate organization within the Department of Defense, it raises the issue of why the Navy doesn't abide by the DOD definition of reactor accident. The Navy's self-serving definitions are part of the Navy's continuing efforts to mislead the public about the risks associated with locating nuclear reactors within a major metropolitan area.

Another example of the Navy's deliberate deception of the public occurred during another of Mr. Guida's presentations, this time at Village Hall in Coronado on May 28, 1997. Mr. Guida was asked about the Navy's policies for reporting accidental releases of radioactivity. Mr. Guida stated that the Navy would comply with the same reporting procedures required by other federally licensed nuclear facilities. When Mr. Guida was asked what amount of radioactivity would trigger the reporting requirement, he stated that any accidental release over ten (10) curies would be reported. Mr. Guida's statement was grossly in error, as the federal reporting requirements are specific to the various radioactive isotopes within an accidental release. The isotope Iodine-131 is of particular concern, because it causes thyroid cancer in children. The official federal limit for accidental release of Iodine-131 is one one-hundredth (0.01) of a curie. The ten (10) curie limit stated by Mr. Guida is one thousand (1000) times the federal limit for Iodine-131 releases. Since Mr. Guida has a master's degree in nuclear engineering from M.I.T., it can be assumed that his error was not made out of ignorance of the subject matter. Mr. Guida's presentation was videotaped and transcribed by the Navy, so there should be a record of his false statements on the subject of reportable limits. (Federal reportable limits for accidental releases of radioactivity, by isotope, are contained in the Code of Federal Regulations 40 CFR 302.5, "Determination of reportable quantities". See Enclosure 3) I.64.2

Finally, I note that the last of the Navy's nuclear-powered cruisers will be taken out of service next year, and no replacements are planned. Given the Navy's thirty (30) year experiment with nuclear cruisers and destroyers, and the Navy's preference for non-nuclear propulsion systems for those types of surface ships, I can see no logical reason why the nuclear carriers would have any advantage that the cruisers and destroyers didn't also have. Nuclear-powered surface combatants either do, or do not, have advantages over their non-nuclear counterparts. If nuclear cruisers and destroyers were ultimately a failed experiment, then I think the same will eventually be said of the nuclear carriers. I.64.3

Sincerely,

Grant Kimball

Grant Kimball

Enclosures

I.64

TRANSCRIPT OF THE

CITY OF CORONADO

CITY COUNCIL MEETING

CORONADO, CALIFORNIA

APRIL 9, 1996

REPORTED BY: KAREN L. BRODIE
CSR NO. 5694

Enclosure 1

WE HAVE A LONG HISTORY OF SAFE OPERATION AND I WANT TO EXPLAIN, BECAUSE THERE HAS INDEED BEEN SOME MISUNDERSTANDING OF WHAT WE MEAN WHEN WE SAY SAFE OPERATION. WE HAVE 4,600 REACTOR YEARS WITHOUT A REACTOR ACCIDENT. WE HAVE NEVER CLAIMED NOT TO HAVE ACCIDENTS OR INCIDENTS. WHAT WE HAVE CLAIMED IS NEVER TO HAVE HAD A REACTOR ACCIDENT. WHAT A REACTOR ACCIDENT IS IS A TERM OF ART IN THE NUCLEAR INDUSTRY; IT MEANS DAMAGE TO NUCLEAR FUEL AND RELEASE OF WHAT ARE CALLED FISSION PRODUCTS. THESE ARE THE HIGHLY RADIOACTIVE ELEMENTS CREATED AS A CONSEQUENCE OF THE FISSION PROCESS WITHIN THE REACTOR.

IF YOU THINK, HAVE THERE BEEN REACTOR ACCIDENTS IN THE WORLD OVER THE YEARS? MOST ASSUREDLY THERE HAVE BEEN. THERE WAS THE S.O. 1 REACTOR, WHICH WAS AN ARMY REACTOR, IN 1963 WHICH HAD A SERIOUS ACCIDENT, A FISSION PRODUCT RELEASE, A REACTOR ACCIDENT. THREE MILE ISLAND IS THE MOST FAMOUS ONE IN THE UNITED STATES, IN 1979, WHEN ABOUT A THIRD OF THE REACTOR MELTED AS A CONSEQUENCE OF A LOSS OF COOLING WATER, AND THEN, OF COURSE, THE MOST SERIOUS REACTOR ACCIDENT IN THE HISTORY OF THE WORLD WAS CHERNOBYL IN 1986.

THOSE ARE REACTOR ACCIDENTS. AGAIN, DAMAGE TO THE FUEL, RELEASE OF FISSION PRODUCTS. WE CLAIM WE HAVE HAD NONE OVER THE HISTORY OF THE PROGRAM, AND THAT'S 4,600 YEARS. OUR SHIPS HAVE STEAMED 106 MILLION MILES AT THIS POINT AND WE'RE ACCUMULATING AT THE RATE OF A COUPLE MILLION MILES A YEAR, AND IN THE PROCESS OF REACHING THAT RECORD -- WE REACHED THAT RECORD, 100 MILLION MILES, IN

DODD 5230.16 Nuclear Accident and Incident Public Affairs (PA) Guidance, December 20, 1993

**** Text of the Regulation ****
Refs: (a) DoD Directive 5230.16, subject as above, February 7, 1983 (hereby canceled)
(b) Federal Preparedness Circular 8, "Public Affairs in Emergencies," June 22, 1989 NOTE: Available from the Federal Emergency Management Agency, 500 C Street, SW, Washington, D.C. 20429 END NOTE:
(c) DoD Directive 5100.52, "DoD Response to an Accident or Significant Incident Involving Radioactive Materials," December 21, 1989
(d) Executive Order 12356, "National Security Information," April 2, 1982
(e) through (h)1 see enclosure 1

A. REISSUANCE AND PURPOSE

This Directive:

1. Reissues reference (a) to update DoD policy, responsibilities, and procedures for the prompt release of information to the public in the interest of public safety, and to prevent public alarm in the event of accidents or significant incidents involving nuclear weapons or nuclear components, radioactive material, nuclear weapon launch or transport vehicles (when a nuclear weapon is aboard), or nuclear reactors under DoD control.

2. Updates DoD policy, responsibilities, and procedures during an improvised nuclear device (IND) incident.

B. APPLICABILITY

This Directive applies to the Office of the Secretary of Defense, the Military Departments, the Chairman of the Joint Chiefs of Staff, the Unified Commands, the Defense Agencies, and the DoD Field Activities (hereafter referred to collectively as "the DoD Components"). The term "Military Departments," as used herein, refers to the Airy, the Navy, the Air Force, and the Marine Corps.

C. DEFINITIONS

Terms used in this Directive are defined in enclosure 2.

D. POLICY

It is DoD policy:

1. To establish efficient and effective procedures for the release of information to the public in the event of nuclear accidents, IND incidents, or nuclear weapon significant incidents. These procedures include exceptions to the policy of neither confirming nor denying the presence or absence of nuclear weapons at any specified location.

Enclosure 2

and/or material. Establishment of an NDA temporarily places such non-Federal lands under the effective control of the Department of Defense and results only from an emergency event. The OSC or DSR at the scene shall define the boundary, mark it with a physical barrier, and post warning signs. The landowner's consent and cooperation shall be obtained whenever possible; however, military necessity will dictate the final decision regarding location, shape, and size of the NDA.

21. National Security Area (NSA). An area established on non-Federal lands located within the United States, its possessions or territories, for safeguarding classified information and/or restricted data, equipment, or material belonging to the DoE. Establishment of a national security area temporarily places such non-Federal lands under the effective control of the DoE and results only from an emergency event. The senior DoE representative having custody of the material at the scene shall define the boundary, mark it with a physical barrier, and post warning signs. The landowner's consent and cooperation shall be obtained whenever possible; however, operational necessity shall dictate the final decision regarding location, shape, and size of the national security area.

22. Nuclear Reactor Accident. An uncontrolled reactor criticality resulting in damage to the reactor core or an event such as loss of coolant that results in significant release of fission products from the reactor core.

I.64

23. Nuclear Weapon Accident. An unexpected event involving nuclear weapons or nuclear components that results in any of the following:

a. Accidental or unauthorized launching, firing, or use by U.S. forces or U.S. supported Allied forces of a nuclear-capable weapons system.

b. An accidental, unauthorized, or unexplained nuclear detonation.

c. Non-nuclear detonation or burning of a nuclear weapon or nuclear component.

d. Radioactive contamination.

e. Jettisoning of a nuclear weapon or nuclear component.

f. Public hazard, actual or perceived.

24. Nuclear Weapon Significant Incident. An unexpected event involving nuclear weapons, nuclear components, or a nuclear weapon transport or launch vehicle when a nuclear weapon is mated, loaded, or on board that does not fall into the nuclear weapon accident category but that:

a. Results in evident damage to a nuclear weapon or nuclear component to the extent that major rework, complete replacement, or examination or recertification by the DoE is required.

b. Requires immediate action in the interest of safety or nuclear weapons

-CITE-

40 CFR Sec. *302*.5

-EXPCITE-

Title 40

CHAPTER I

SUBCHAPTER J

PART 302

-HEAD-

Sec. 302.5 Determination of reportable quantities.

-TEXT-

(a) Listed hazardous substances. The quantity listed in the column 'Final RQ' for each substance in Table 302.4, or in appendix B to Table 302.4, is the reportable quantity (RQ) for that substance. The RQs in Table 302.4 are in units of pounds based on chemical toxicity, while the RQs in appendix B to Table 302.4 are in units of curies based on radiation hazard. Whenever the RQs in Table 302.4 and appendix B to the table are in conflict, the lowest RQ shall apply.

(b) Unlisted hazardous substances. Unlisted hazardous substances designated by 40 CFR 302.4(b) have the reportable quantity of 100 pounds, except for those unlisted hazardous wastes which exhibit extraction procedure (EP) toxicity identified in 40 CFR 261.24. Unlisted hazardous wastes which exhibit EP toxicity have the reportable quantities listed in Table 302.4 for the contaminant on which the characteristic of EP toxicity is based. The reportable quantity applies to the waste itself, not merely to the toxic contaminant. If an unlisted hazardous waste exhibits EP toxicity on the basis of more than one contaminant, the reportable quantity for that waste shall be the lowest of the reportable quantities listed in Table 302.4 for those contaminants. If an unlisted

Enclosure 3

Holmium-159	67	1000 (3.7E 13)
Holmium-161	67	1000 (3.7E 13)
Holmium-162m	67	1000 (3.7E 13)
Holmium-162	67	1000 (3.7E 13)
Holmium-164m	67	1000 (3.7E 13)
Holmium-164	67	1000 (3.7E 13)
Holmium-166m	67	1 (3.7E 10)
Holmium-166	67	100 (3.7E 12)
Holmium-167	67	100 (3.7E 12)
Hydrogen-3	1	100 (3.7E 12)
Indium-109	49	100 (3.7E 12)
Indium-110 (69.1 min)	49	100 (3.7E 12)
Indium-110 (4.9 hr)	49	10 (3.7E 11)
Indium-111	49	100 (3.7E 12)
Indium-112	49	1000 (3.7E 13)
Indium-113m	49	1000 (3.7E 13)
Indium-114m	49	10 (3.7E 11)
Indium-115m	49	100 (3.7E 12)
Indium-115	49	0.1 (3.7E 9)
Indium-116m	49	100 (3.7E 12)
Indium-117m	49	100 (3.7E 12)
Indium-117	49	1000 (3.7E 13)
Indium-119m	49	1000 (3.7E 13)
Iodine-120m	53	100 (3.7E 12)
Iodine-120	53	10 (3.7E 11)
Iodine-121	53	100 (3.7E 12)
Iodine-123	53	10 (3.7E 11)
Iodine-124	53	0.1 (3.7E 9)
Iodine-125	53	0.01 (3.7E 8)
Iodine-126	53	0.01 (3.7E 8)
Iodine-128	53	1000 (3.7E 13)
Iodine-129	53	0.001 (3.7E 7)
Iodine-130	53	1 (3.7E 10)
Iodine-131	53	0.01 (3.7E 8)
Iodine-132m	53	10 (3.7E 11)
Iodine-132	53	10 (3.7E 11)
Iodine-133	53	0.1 (3.7E 9)
Iodine-134	53	100 (3.7E 12)
Iodine-135	53	10 (3.7E 11)
Iridium-182	77	1000 (3.7E 13)
Iridium-184	77	100 (3.7E 12)
Iridium-185	77	100 (3.7E 12)
Iridium-186	77	10 (3.7E 11)
Iridium-187	77	100 (3.7E 12)
Iridium-188	77	10 (3.7E 11)
Iridium-189	77	100 (3.7E 12)
Iridium-190m	77	1000 (3.7E 13)
Iridium-190	77	10 (3.7E 11)
Iridium-192m	77	100 (3.7E 12)
Iridium-192	77	10 (3.7E 11)
Iridium-194m	77	10 (3.7E 11)
Iridium-194	77	100 (3.7E 12)
Iridium-195m	77	100 (3.7E 12)
Iridium-195	77	1000 (3.7E 13)
Iron-52	26	100 (3.7E 12)
Iron-55	26	100 (3.7E 12)
Iron-59	26	10 (3.7E 11)
Iron-60	26	0.1 (3.7E 9)
Krypton-74	36	10 (3.7E 11)
Krypton-76	36	10 (3.7E 11)
Krypton-77	36	10 (3.7E 11)
Krypton-79	36	100 (3.7E 12)
Krypton-81	36	1000 (3.7E 13)
Krypton-83m	36	1000 (3.7E 13)
Krypton-85m	36	100 (3.7E 12)
Krypton-85	36	1000 (3.7E 13)
Krypton-87	36	10 (3.7E 11)
Krypton-88	36	10 (3.7E 11)
Lanthanum-131	57	1000 (3.7E 13)
Lanthanum-132	57	100 (3.7E 12)
Lanthanum-135	57	1000 (3.7E 13)
Lanthanum-137	57	10 (3.7E 11)
Lanthanum-138	57	1 (3.7E 10)
Lanthanum-140	57	10 (3.7E 11)
Lanthanum-141	57	1000 (3.7E 13)
Lanthanum-142	57	100 (3.7E 12)
Lanthanum-143	57	1000 (3.7E 13)
Lead-195m	82	1000 (3.7E 13)
Lead-198	82	100 (3.7E 12)
Lead-199	82	100 (3.7E 12)
Lead-200	82	100 (3.7E 12)
Lead-201	82	100 (3.7E 12)
Lead-202m	82	10 (3.7E 11)
Lead-202	82	1 (3.7E 10)
Lead-203	82	100 (3.7E 12)
Lead-205	82	100 (3.7E 12)
Lead-209	82	1000 (3.7E 13)
Lead-210	82	0.01 (3.7E 8)
Lead-211	82	100 (3.7E 12)
Lead-212	82	10 (3.7E 11)
Lead-214	82	100 (3.7E 12)
Lutetium-169	71	10 (3.7E 11)
Lutetium-170	71	10 (3.7E 11)
Lutetium-171	71	10 (3.7E 11)
Lutetium-172	71	10 (3.7E 11)
Lutetium-173	71	100 (3.7E 12)
Lutetium-174m	71	10 (3.7E 11)
Lutetium-174	71	10 (3.7E 11)
Lutetium-176m	71	1000 (3.7E 13)
Lutetium-176	71	1 (3.7E 10)
Lutetium-177m	71	10 (3.7E 11)
Lutetium-177	71	100 (3.7E 12)
Lutetium-178m	71	1000 (3.7E 13)
Lutetium-178	71	1000 (3.7E 13)
Lutetium-179	71	1000 (3.7E 13)
Magnesium-28	12	10 (3.7E 11)
Manganese-51	25	1000 (3.7E 13)
Manganese-52m	25	1000 (3.7E 13)
Manganese-52	25	10 (3.7E 11)
Manganese-53	25	1000 (3.7E 13)
Manganese-54	25	10 (3.7E 11)
Manganese-56	25	100 (3.7E 12)
Mendelevium-257	101	100 (3.7E 12)
Mendelevium-258	101	1 (3.7E 10)
Mercury-193m	80	10 (3.7E 11)
Mercury-193	80	100 (3.7E 12)
Mercury-194	30	0.1 (3.7E 9)
Mercury-195m	80	100 (3.7E 12)
Mercury-195	80	100 (3.7E 12)
Mercury-197m	80	1000 (3.7E 13)
Mercury-197	80	1000 (3.7E 13)
Mercury-199m	80	1000 (3.7E 13)
Mercury-203	80	10 (3.7E 11)
Molybdenum-90	42	100 (3.7E 12)
Molybdenum-93m	42	10 (3.7E 11)
Molybdenum-93	42	100 (3.7E 12)
Molybdenum-99	42	100 (3.7E 12)
Molybdenum-101	42	1000 (3.7E 13)
Neodymium-136	60	1000 (3.7E 13)
Neodymium-138	60	1000 (3.7E 13)
Neodymium-139m	60	100 (3.7E 12)
Neodymium-139	60	1000 (3.7E 13)
Neodymium-141	60	1000 (3.7E 13)
Neodymium-147	60	10 (3.7E 11)

Comment Number	Response

Grant Kimball

I.64.1 Please see responses to comments O.12.83 and O.12.33. Also, with regard to the SL-1 reactor, the Navy had no involvement, technical or otherwise, in that project. The reactor was not designed for combat, and was not designed to Navy standards for shipboard operation: it is not possible to remove control rods manually from an operating U.S. Naval reactor as happened at SL-1. In addition, none of the three personnel killed in the SL-1 accident, which occurred in 1961, was involved with the Naval Nuclear Propulsion Program. One Navy enlisted person, from the Navy's civil engineering community, was among the fatalities, but that person was neither trained by nor had any connection to the Naval Nuclear Propulsion Program. Thus, that accident does not reflect on Naval Nuclear Propulsion Program safety.

I.64.2 The 10 curie limit applies to Cobalt 60 as Mr. Guida discussed in the 28 May 97 meeting on the Mixed Waste Storage Facility RCRA Permit Meeting. Mr. Guida used Cobalt 60 as an example because it is the primary radionuclide of concern for NNPP operations. The exact quote from the transcription of Mr. Guida testimony on this issue is:

"Under EPA regulations that pertain to releases of hazardous materials to the environment, that is under what's called their Super Fund (sic) Regulations. In the Comprehensive Environmental Response, Compensation and Liability Act, the EPA has set certain standards where if you release more than a certain amount of a hazardous material, you have to report to the EPA that you've had this incident, an accident. And they've got certain levels for oil spills, for ethylene glycol, which is an antifreeze. They have levels for thousands and thousands of substances.

One particular substance they've got a level for is Cobalt-60, which is the principle radioactive radionuclide that we're talking about. For Cobalt-60, the release threshold is 10 curies. That means if you released more than 10 curies of Cobalt-60, you would have to report that to the Environmental Protection Agency."

As stated by the commentor, the reportable quantity for iodine-131 is 0.01 curie. The source terms for the radiological accident analyses in Appendix F list the radionuclides that result in at least 99 percent of the possible exposure. Iodine-131 is not on this list since it is not present in sufficient quantities to contribute substantially to radiation exposure from an accident. The Navy has determined that the radiological risks from the proposed action would not be significant.

Please also see response to comment O.12.81.

Comment Number	Response
I.64.3	Please see response to comment I.56.5.

Oct 29, 1998

Secretary of the Navy
Mr. Richard Danzig,

I oppose the Navy's plans to turn San Diego into a nuclear megaport and nuclear Dump. San Diegans don't want or need more nuclear-powered Aircraft carriers Nuclear power plants are being closed because of hazards Why would the navy who protects our Country want to stay in the nuclear business? Accidents Happen! I.65.1

Comment Number	Response

Anonymous

I.65.1 Your comments are noted and are included in the Final EIS.

Reproduction clarity limited by quality of comment letter received.

ROBERT & KELLY ALEXANDER
PO BOX 2166
LA JOLLA CA 92038-2166
619 456 5217-FAX

FAX FAX FAX

Mr. Richard Danzig
Secretary of the Navy

Dear Mr. Danzig,

We are writing to you to express our deep anger, fear, and sadness that San Diego has become/will become a Navy Nuclear Megaport. I.66.1

This puts both naval personnel and civilians at risk.

Please, please, please, for God's and all our sakes, please with all of your power and might and influence of your good office, with all of your heart and soul, please oppose this, please.

In this country of ours, with its governement of elected representatives, elected by the people to carry out the wishes and needs of the citizens, you are the person we turn to in time of trouble, of crisis. This is certainly a crisis. We turn to you. Help! Please stop San Diego from becoming a Navy Nuclear Megaport.

IT IS A CATASTROPHE IN THE MAKING!

Thank you.

Sincerely,

Robert & Kelly Alexander

Mr. and Mrs. Robert and Kelly Alexander
PO Box 2166
La Jolla CA 92038-2166

P.S. Please make good on your promise to "put people first" and come to hear from the people directly, seriously considering their concerns.

Please oppose this homeporting plan!!!!

Navy nuclear vessels are not without risk

The Navy assertion endorsed in your editorial (Aug. 24) that nuclear-powered aircraft carriers in San Diego Bay are without risk is factually incorrect.

Your newspaper has carried articles documenting many accidents aboard Navy nuclear vessels, including the deliberate falsification of nuclear reactor safety records aboard a nuclear submarine at Point Loma. Recently, the radiation control officer aboard the nuclear sub tender McKee at Point Loma admitted to knowledge of six or seven other instances of the deliberate falsification of nuclear materials handling aboard naval nuclear vessels.

Using the federal Freedom of Information Act, the Institute for Policy Studies and Greenpeace documented dozens of other catastrophes involving Navy nuclear activities. Still, a U.S. Navy that has lost two nuclear submarines with all hands aboard says it has an accident-free record. The handling of radioactive materials associated with naval nuclear reactors or naval nuclear weapons in San Diego Bay is a matter of legitimate concerns to those living or visiting here.

RICHARD DITTBENNER
Coronado

Comment Number	Response

Robert and Kelly Alexander

I.66.1 Your comments are noted and are included in the Final EIS.

Dr. Darrel Crain
450 Summerhill Court
Alpine, California 91901
Telephone (619) 659-0176
Fax (619) 445-1059
Email: dcraindc@connectnet.com

October 29, 1998

Mr. Richard Danzig, Secretary of the Navy
Fax (703) 614-3477
Telephone (703) 695-3131

Mr. Danzig,

As a health care professional in our fair city, I implore you to carefully review your plans for our lovely town and the consequences to our hard-working people. I.67.1

This letter is in response to the proposed stationing of nuclear-powered aircraft here in San Diego. The people of San Diego do not wish to have these carriers here for several reasons:

1) The presence of nuclear craft poses serious risks to public health and safety.
2) The result would be more radioactive and toxic waste travelling on public roads which are congested to begin with.
3) The location is right in the heart of metropolitan San Diego, an unsuitable location for decades of handling of nuclear materials and the inevitable spills and mishaps. You and I both know, accidents do happen.

As you may be aware, a report from the Government Accounting Office concludes that nuclear carriers are much more costly than conventionally-powered carriers, and yet they offer few advantages over conventional ones. I.67.2

You are in a unique position to cancel these plans and provide for a safer future for our children and future generations, simply by scrapping the outmoded and wasteful nuclear reactors for motive power. I.67.3

In any case, before you make your final decisions, please come to San Diego personally and hear how the people of San Diego feel about nuclear-powered carriers in the San Diego Bay.

In Health,

Dr. Darrel Crain

Comment Number	Response

Darrel Crain

I.67.1	Please see responses to comments O.12.49, and O.12.132, and I.4.1.
I.67.2	Please see response to comment O.12.55 and I.63.7.
I.67.3	Your comments are noted and are included in the Final EIS.

Reproduction clarity limited by quality of comment letter received.

LifeTracks Adventure Safaris

The winds on the Serengeti Plains are whispering your name...

October 30, 1998

Secretary of the Navy,
Mr. Richard Danzig
FAX 703-614-3477

In a democracy you represent me and my family as well as your own interests. I understand you will make the final decision to add more nuclear carriers to San Diego Bay. Would you please come to San Diego and hear from the people who live here. We do not want our beautiful city or bay turned into a nuclear dump or nuclear megaport! I.68.1

I have always opposed nuclear power from the very beginnings of my awareness of its destructive power when directed as well as when humans make mistakes with it and misdirect it; i.e. Chernobyl, Three Mile Island and other tragedies. ACCIDENTS DO HAPPEN! There are no guarantees it won't happen again! Also consider the problems of the year 2000 and those government computers that may just STOP! Y2K is real!

I oppose any and all plans to bring more destructive power to my beloved San Diego Bay. The environment and the people are too precious to continue this insanity!

According to my sources, the US Government Accounting Office reports no strategic advantage of nuclear carriers over conventional carriers (although Nuclear costs + 8 Billion dollars more!)

Please cancel the nuclear carriers and redirect that money into more immediate and humanatarian needs. Perhaps even Y2K compliance!

Thank you,

Nancy J. Hartland
Happy San Diegan,
a Maine taxpayer

CC: to Bill Cohen

9075 Redwood St, San Diego, CA 92104 619-280-1958 800-368-8716 fax 619-280-1978 email: lifetracks@xpress.com

Comment Number	Response

Nancy Hartland

I.68.1 Two public hearings on the Draft EIS have been held in the San Diego region and public testimony received, as required under NEPA. The Navy does not currently have plans to have a follow-on community workshop for an informal dialogue. Concerns generated during the public review of the EIS will be considered by Navy personnel responsible for making decisions regarding the proposed action. Navy representatives at the EIS public hearings are directly involved with this decision-making process, and provide recommendations to the Secretary of the Navy regarding the preferred alternative to be implemented.

Furthermore, the Navy ensures that the EIS decisionmaker has a complete copy of the public hearing transcripts. The Navy believes that the objective sought by the comment is met by the fact that the transcript of the public hearing is prepared and reviewed as part of the NEPA process leading up to the Record of Decision.

Please also see response to comments O.12.57, I.63.7, I.4.1, O.12.55, and O.12.49.

October 29, 1998

To: Secretary of the Navy, Mr. Richard Danzig

Dear Mr. Danzig:

I.69.1

I am writing to voice my opposition to the Navy's plan to home-port nuclear carriers in San Diego. You no doubt think that protesters to this plan just "don't know the facts"; people like you do not think there is danger in nuclear technology. You do not think that nuclear waste poses a tremendously dangerous threat, not only to us now living, but to our children and grandchildren and great-grandchildren. You think that the advantages far outweigh the risks.

The military mind thinks that it's okay if some people get injured or killed, as long as it's not too many.

I want you to understand that under no circumstances do the people of San Diego want their beautiful city to become a nuclear dump for the Navy.

You are making our city a target for all kinds of enemy attacks.

And you are endangering millions of people, not only in San Diego, but also in Tijuana and Baja California. Please listen to what we are saying. Come to San Diego and listen and see for yourself. This is our home, not your Nuclear Megaport.

Thank you very much.

Sincerely,

Stephanie Mood
4538 Long Branch Ave.
San Diego, CA 92107

Comment Number	Response

Stephanie Mood

I.69.1 Your comments are noted and are included in the Final EIS.

Reproduction clarity limited by quality of comment letter received.

Attn: Mr. Richard Danzig

October 29, 1998

To: Secretary of the Navy, Mr. Richard Danzig

Dear Mr. Danzig,

I am writing to you today to voice my opposition to the proposed stationing of nuclear aircraft carriers in San Diego. I am not aligned with any group, but respectfully ask you to meet with the Environmental Health Coalition. I believe that their concern for the welfare and safety of San Diego's citizenry is legitimate. I.70.1

I had previously planned on making San Diego my permanent home, but if it is to become a port for nuclear carriers then I would prefer to live somewhere where that practice will not be carried out. San Diego is nationally known for its beauty, its people, its friendliness, but most of all its cleanliness. When people find out that nuclear warships will be stationed in San Diego , I believe you will not only see a drop in tourism, but in the number of educated and skilled workers that San Diego can currently attract. This city will become less competitive and less likely to attract industries that will allow the city economic expansion. And all this will be due to the fear that people will have for themselves, their families, but most importantly for their children in living in proximity to a nuclear port and repair facility.

I don't oppose the military and I believe that we need a strong military as we do not live in an ideal world. At the same time, though, I believe that the decisions which affect the military and this country's citizens should be made intelligently. The US Government's General Accounting Office reports that there is no strategic advantage of nuclear carriers over conventional ones. Besides the fact that the nuclear carriers cost $ 8 billion more. I urge you to cancel the nuclear carriers and put the savings into other more urgent needs that the military has. I.70.2

Thank you for your time and attention to this letter.

Sincerely,

Richard Moran

Comment Number	Response

Richard Moran

I.70.1	Your comments are noted and are included in the Final EIS.
I.70.2	Please see response to comment O.12.49, O.12.55, I.4.1, and I.63.7.

Nancy Teas
450 Summerhill Court
Alpine, California 91901
Telephone (619) 659-0176
Fax (619) 445-1059
Email: nancyt@connectnet.com

October 29, 1998

Mr. Richard Danzig, Secretary of the Navy
Fax (703) 614-3477
Telephone (703) 695-3131

Mr. Danzig,

This letter is in response to the proposed stationing of nuclear-powered aircraft here in San Diego. Please do not station these carrier here. I.71.1

These carriers:

1) poses serious risks to public health and safety of San Diego.
2) would result in more radioactive and toxic waste traveling on congested public roads.
3) would be located right in the heart of metropolitan San Diego, an unsuitable location for decades of handling of nuclear materials.

As you are undoubtedly aware, a report from the Government Accounting Office concludes that nuclear carriers are much more costly than conventionally-powered carriers, and yet they offer few advantages over conventional ones. I.71.2

Please get rid of the outmoded and wasteful nuclear reactors for motive power and keep them out of San Diego.

Sincerely,

Nancy Teas

Comment Number	Response
Nancy Teas	
I.71.1	Your comments are noted and are included in the Final EIS.
I.71.2	Please see response to comment O.12.49, O.12.55, I.4.1, and I.63.7.

urgent

facsimile

To:	**SEC.OF NAVY, MR. RICHARD DANZIG**
Company:	
Fax Number:	+1 (703) 614-3477
Business Phone:	
From:	Irv
Fax Number:	+1 (619) 692-1642
Business Phone:	
Home Phone:	
Pages:	1
Date/Time:	10/30/98 2:36:34 PM
Subject:	NUCLEAR MEGAPORT IN SAN DIEGO, CA

WE OPPOSE YOUR PLANS TO INSTALL ADDITIONAL NUCLEAR CARRIERS. I.72.1
WE MUST SPEAK WITH YOU IN PERSON, AND WE WISH TO HAVE A PUBLIC TASK FORCE SET UP TO STUDY THE SAFETY OF THE NAVY'S PLAN. THERE HAS BEEN VERY LITTLE MEDIA AND NOTICE GIVEN TO THE SAN DIEGO PUBLIC

I SUPPORT MY CONGRESSMAN IN HIS REQUEST FOR MORE PUBLIC INPUT..

MR. IRVING B. HOSENPUD

Comment Number	Response

Irv Hosenpud

I.72.1 Your comments are noted and are included in the Final EIS.

1030 Calaveras Dr.
San Diego, CA 92107

Secretary of the Navy
Mr. Richard Danzig

Dear sir:

I oppose homeporting of nuclear carriers in the San Diego in the strongest possible way! I.73.1

San Diego is the 6th largest city in the United States. The population density alone should prohibit a Nuclear Megaport in San Diego! There are seismic considerations that also make this move unwise.

San Diego doesn't need or want nuclear risk! Please listen to the people of San Diego and put the nukes somewhere else (or go conventional power).

Sincerely,

Jayne Cassedy

Comment Number	Response

Jayne Cassedy

I.73.1 Your comments are noted and are included in the Final EIS.

1030 Calaveras Dr.
San Diego, CA 92107

Secretary of the Navy
Mr. Richard Danzig

Dear Mr. Danzig:

I oppose homeporting of nuclear carriers in the San Diego in the strongest possible way! I.74.1

San Diego doesn't need or want nuclear risk! Please listen to the people of San Diego and put the nukes somewhere else (or go conventional power).

Very truly,

Paul Cassedy

P.S. Why didn't you come to the public hearings in San Diego?

Comment Number	Response

Paul Cassedy

I.74.1 Your comments are noted and are included in the Final EIS.

Mitch C. Wallis
10360 Glenellen Way
San Diego, CA 92126

via fax: (703) 614-3477

October 29, 1998
Secretary of the Navy,
Mr. Richard Danzig
re: Proposed Nuclear Ships/San Diego Bay

DEAR SECRETARY DANZIG:

I am writing to protest the proposed installation of three nuclear-powered aircraft carriers in San Diego Bay. I.75.1

I vehemently oppose the plan to turn San Diego into a Nuclear Megaport and Nuclear Dump.

Please note especially that the U.S. General Accounting Office reports that no strategic advantage of nuclear carriers over conventional carriers will result AND nuclear carriers cost 8 billion dollars more! I.75.2

PLEASE CANCEL the nuclear carriers and use the savings for more pressing needs. I.75.3

Thank you.

Yours truly,

Mitch C. Wallis
MCw/me

Comment Number	Response
Mitch Wallis	
I.75.1	Your comments are noted and are included in the Final EIS.
I.75.2	Please see response to comment O.12.49, O.12.55, I.4.1, and I.63.7.
I.75.3	Your comments are noted and are included in the Final EIS.

DEVELOPING HOME PORT FACILITIES FOR
THREE NIMITZ-CLASS AIRCRAFT CARRIERS
IN SUPPORT OF THE U.S. PACIFIC FLEET

DRAFT ENVIRONMENTAL IMPACT STATEMENT

DRAFT EIS COMMENTS

Name: KEN KJOLLER

Address: 310 D AVE, CORONADO, CA 92118

COMMENTS:

I ATTENDED THE MEETING AT THE VILLAGE ELEMENTARY SCHOOL ON OCT. 27. I WENT WITH A GENERALLY FAVORABLE FEELING ABOUT THE PLAN TO HOMEPORT THREE CVN's AT NORTH ISLAND.

HOWEVER, I LEFT WITH THE THOUGHT THAT THE NAVY IS MUCH LESS INTERESTED IN THE CONCERNS OF THE CITIZENS OF CORONADO THAN IS APPROPRIATE. THE TWO ISSUES THAT ARE MOST PROMINENT ARE: (1) A SYSTEM FOR PROVIDING EMERGENCY WARNING TO THE POPULATION OF CORONADO IN THE EVENT OF A NUCLEAR ACCIDENT AND (2) MITIGATION OF THE INCREASED TRAFFIC ON CITY STREETS DUE TO THE PRESENCE OF THESE SHIPS. I.76.1

THESE CONCERNS NEED TO BE ADDRESSED WITH MUCH GREATER SENSITIVITY THAN HAS YET BEEN EVIDENT. IT IS TIME FOR OUR NAVY "TO STEP UP TO THE PLATE."

RESPECTFULLY,

Ken Kjoller

Signature

NOV 10, 1998

Date

Note: This form is supplied for your convenience. You are not required to use this form. Comments of any length may be submitted to the address on the reverse side of this form. Your comments should be postmarked on or before November 12, 1998.

Comment Number	Response

Ken Kjoller

I.76.1 For the portion of the comment addressing an emergency warning system in the event of a nuclear accident, please see response to comment L.4.36.

The additional traffic that would be generated by the proposed action would increase the traffic volumes on the Coronado streets. The existing conditions reflecting traffic on the Coronado transportation network were derived from traffic counts taken when two carriers were in port, during the summer when the greatest amount of vehicles would be present, associated with tourist activity (August 1996). The traffic impact analysis is based on incremental changes in site-generated traffic when the proposed CVNs are in port. The impact analysis of two additional CVNs in section 3.9.1.2.3 evaluates conditions that would occur 96 percent of the time when two or fewer carriers would be in port at the same time. The impact created by this condition, 27 vehicle trips during the peak hour, would be less than significant. Also, intermittent, short-term impacts resulting on the 13 days (4 percent of the time) when all three carriers would be in port simultaneously are evaluated. Though substantial, the impacts on intersections and roadways during these days would be short-term and less than significant. Please see response to comment L.4.16 for detail on how the transportation analysis has been revised.

Although specific traffic-related mitigation measures are not needed of the proposed action, the Navy does have an ongoing series of strategies designed to reduce the level of traffic generated by NASNI, such as a ferry system, carpool/vanpool programs, installation of bicycle racks, a guaranteed ride home program (for rideshare users with a mid-day emergency), and an educational program to promote these strategies. In addition, the Navy is considering a redesign of the Main Gate so that the entrance would align with Third Street and thereby provide a more direct connection into and out of the base.

11-18-98A07:5[illegible] RCVD

[illegible]:5[illegible] RCVD

November 16, 1998

Samantha Ellis
3728 1/2 Ingraham St.
San Diego, CA 92109

Mr. John Coon
Southwest Division (Code 05AL.JC)
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Dear Mr. Coon:

I am writing to express my disapproval and protest of having nuclear carriers in our San Diego bay. In light of all the dangers involved with nuclear power, it is unsafe to port even one nuclear carrier so close to where so many families live. I.77.1

I belong to the Peace Resource Center, which has been studying and following this dilemma for many years now. I have seen the findings of the GAO report, along with many other reports, that prove that nuclear power is not the right answer for this San Diego region. In fact, it would be blatantly endangering our lives, environment, and the other inhabitants of this area. The Navy's draft Environmental Impact Statement does not fully address all the consequences of a nuclear accident. Nothing does.

I urge you to consider the families and environment of this beautiful, vibrant region, and not put us in danger by housing nuclear carriers in our bay.

Sincerely,

S. L. Ellis

Samantha Ellis

Comment Number	Response

Samantha Ellis

I.77.1 Please see response to comment O.12.49, O.12.55, I.4.1, and I.63.7.

November 12, 1998

Mr. John Coon
Southwest Division (Code 05AL.JC)
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Re: Draft Environmental Impact Statement for Developing Home Port Facilities for Three NIMITZ-Class Aircraft Carriers in Support of the Pacific Fleet

Dear Mr. Coon:

After reviewing the Navy's draft EIS (DEIS), additional relevant documents and memos, and in support of the comments made orally and in writing by the following: I.78.1

- City of Coronado,
- Environmental Health Coalition, San Diego,
- Peace Resource Center, San Diego,
- Marilyn Field, resident of Coronado,
- Joel I. Cehn, CHP, radiation expert hired by the City of Coronado,
- Robert Sergeant, traffic consultant hired by the City of Coronado,
- Charles Bull, noise consultant hired by the City of Coronado,
- Dr. David Richardson, epidemiologist hired by the Environmental Health Coalition
- Bernd Franke and Arjun Makhijani, radiological consultants hired by the Environmental Health Coalition,
- Camille Sears, independent expert hired by the Environmental Health Coalition to review the health and safety sections of the DEIS and
- Quinton & Petix, the legal firm retained by the City of Coronado

We conclude that the document is fatally flawed and does not comply with the requirements of the National Environmental Policy Act, 42 U.S. Code S 4331, et seq. [NEPA] nor CEQA.

I.78

I.78.1

Further, in agreement with the findings of the above listed parties, we are forced to conclude that the Navy must make substantial corrections, additions to its assumptions, methodologies and factual conclusions. A new draft DEIS must be issued to ensure that the information is scientifically accurate and, a new public hearing must be held to allow for discussion and public disclosure.

Per the fundamental premise stated in the regulatory guidelines for implementation of NEPA, promulgated by the federal Council on Environmental Quality (CEQ), at 40 C.F.R. S 1500.1:

(b) NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of *high quality. Accurate scientific analysis*, expert agency comments, and public scrutiny are *essential* to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. (Emphasis added).

Per Quinton & Petix, the legal council retained by the City of Coronado, "these principles have recently been reiterated by the Ninth Circuit Court of Appeals, in the case of Idaho Sporting Congress v Thomas, 137 F.3d 1146, at 1151 (9th Cir. 1998)

Another fundamental principle that the Navy should have followed in preparing the DEIS is set forth in 40 C.F.R. S 1502.24, entitled "Methodology and scientific accuracy":

"Agencies shall insure the professional integrity, including scientific integrity, of the discussion and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit references by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix."

The City of Coronado's consultants as well as those hired by the Environmental Health Coalition have all identified numerous instances in the DEIS where the Navy has failed to comply with the above NEPA implementing regulations (see enclosed).

Per the Quinton & Petix"

"It appears that the Navy has failed to provide information of 'high quality' and in fact has totally omitted any supporting data with respect to key environmental issues..."

Further,

I.78.2

"While the Navy's DIES appears to pay lip-service to the requirement of discussing the cumulative impact the current project will have on the environment of Coronado, ostensibly devoting an entire section to the DEIS to that topic, it arguably fails to include an adequate listing of past projects and overall traffic growth and therefore erroneously concludes that the current proposal's impact will not have a cumulative effect on the environment."

I.78.3

As the U.S. Court of Appeals for the Ninth Circuit has recently observed:

"The duty to discuss cumulative impacts in an Environmental Impact Statement is *mandatory*. See 40 C.F.R. S 1502.16. The controlling regulation defines "cumulative impact" as:

"the impact on the environment which results from the incremental impact of the action when to other *past*, present and reasonably foreseeable future actions *regardless* of what agency (federal or non-federal) or *person* undertakes such other actions. Cumulative impacts can result from *individually minor but collectively significant* actions taking place over a period of time.
40 C.F.R. S 1508.7
City of Carmel-by-the-Sea v. U.S. Dept. of Transp., 123 F.3d 1142, at 1160 (9th Cir. 1997) (emphasis added)"

I.78

As stated in the City of Coronado's comment letter to the Navy on the DEIS:

"NASNI has incrementally expanded its functions and complement of personnel, slowly increasing the scope and intensity of the negative impacts of its operation on Coronado". Further, "The City is concerned that this draft EIS does not adequately address the impact on Coronado of basing two or three CVN's on NASNI, or fulfill the requirements of NEPA."

"The National Environmental Policy Act and its requisite EIS analysis requires full unbiased disclosure of the likely effects of Federal projects. The City believes that separating the impact of the homeporting of three CVN's between two EIS analyses, and then failing to consider the cumulative impacts of these decisions in the most recent EIS, effectively circumvents the fundamental objective of NEPA of guarding the environment 'through discussion and disclosure'."

I.78.4

Per Quinton & Petix:

"The Navy has not fulfilled its duties under NEPA in conducting its inquiry into the environmental consequences of the preferred home porting alternative. The fundamental purpose of NEPA, as stated by the federal Council on Environmental Quality, in its regulations implementing NEPA:

40 C.F.R. Sec. 1500.1 Purpose.
(a) The National Environmental Policy Act (NEPA) is our basic national charter for protection of the environment. It establishes policy, sets goals (section 101), and provides means (section 102) for carrying out the policy. Section 102(2) contains 'action-forcing" provisions to make sure that federal agencies act according to the letter and spirit of the Act. (Quotation marks in original.).

Preparation of accurate and informative environmental documents is an essential part of the Navy's obligations under NEPA, since this is an integral part of the 'action-forcing' procedure that leads decisionmakers to take a "hard look" at environmental consequences, and hopefully, as a result, make decisions that are wise for the public good. *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 109 S. Ct. 1835, at 1846 (1989). To that end, the federal CEQ has further declared its policy, inpart, as follows:

40 C.F.R. S 1500.2 Policy.
Federal agencies shall to the fullest extent possible:

(b) Implement procedures to make the NEPA process more useful to decisionmakers and the public; to reduce paperwork and the accumulation of extraneous background data; and to emphasize real environmental issues and alternatives. Environmental impact statements shall be concise, clear and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyzes.

(e) Use the NEPA process to identify and access the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment.

(f) Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.

It is certainly arguable that the DEIS under scrutiny fails to measure up to the standards set forth above in section 1500.2 (b). and would be subject to legal challenge, if the Navy were to ignore these defects when they are brought to its attention.

In conclusion, in accordance with NEPA procedures which must insure that environmental information is made available to public officials and citizens before decisions are made and before actions are taken, we insist that the Navy's DEIS must be revised and resubmitted for public scrutiny. Further, new public hearings must be held in order to allow for new presentation of data and public comment..

Respectfully yours,

Stephanie S. Kaupp
1133 First Street , Unit 418
Coronado, CA 92118
(619) 435-5703

Stephanie S. Kaupp

Elizabeth Gill
411 First Street
Coronado, CA 92118
(619) 437-1966

Elizabeth Gill

Enclosures and References:

Letter to the City of Coronado from Quinton & Petix
Letter to the Environmental Health Coalition from Camille Sears, MS
Letter to the Environmental Health Coalition from Bernd Frank and Dr. Arjun Makhijani
Letter to the Environmental Health Coalition from Dr. David Richardson
Letter to the Mayor and City Council from E. Miles Harvey, the Landing Homeowners Association
Letter from Marilyn Field, to the City of Coronado, November 6, 1998
Memorandums of October 14 and November 5, 1998 from Joel I. Cehn, CHP, to the City of Coronado
Reference additional and final comments by Joel I. Cehn to the City of Coronado
Reference "Generations at Risk", released by Physicians for Social Responsibility and CALPIRG, November 11, 1998 (see references made on Military/Navy Toxics)

I.78

I.78.4

The attachments to this letter, listed here, can be identified as referenced below:

The following letters were submitted by the City of Coronado as part of their attachment and numbered by the City with pages listed in parenthesis:

- Letter from Quinton & Petix, October 14, 1998 (pp. 4 - 9).
- Letter from The Landing Homeowners Association, dated September 24, 1998 (pp. 153-155).
- Letter from Marilyn G. Field to Mayor Tom Smisek, Members of City Council, and Homer Bludau, City Manager, Novemenr 6, 1998 (pp. 74 - 80).
- Memo from Joel I. Cehn, CHP, Radiation Safety Consultant to Homer Bludau, City of Coronado RE: Interim report on Radiation Monitoring Study, October 14, 1998. (pp. 16 -22).

The following letters were previously received and have been identified as attachments to comment letter O.12 from Environmental Health Coalition:

- Letter from Camille Sears to the Environmental Health Coalition, November 10, 1998.
- Letter from Bernd Franke for Institute for Energy and Environmental Research to Laura Hunter, Environmental Health Coalition, November 11, 1998.
- Comments of Dr. David Richardson, Department of Epidemiology, School of Public Health, University of North Carolina, Chapel Hill, NC.

Comment Number	Response

Stephanie S. Kaupp and Elizabeth Gill

I.78.1 Please see responses to comments to the 10 letters of comment on the Draft EIS that you have referenced. Specifically see responses to comments O.12.5, O.12.8, O.12.9, O.12.15, O.13.5, and O.13.9. The Navy does not agree with your comments.

I.78.2 This comment addresses the adequacy of the past, present, and reasonably foreseeable projects evaluated in the NASNI cumulative impact assessment. The list of reasonably foreseeable projects included in the cumulative analysis has been increased as requested by the City of Coronado. The revised cumulative analysis in section 3.18 incorporates these projects. Please see response to comment L.2.1.

I.78.3 This comment addresses the adequacy of the NASNI cumulative impact assessment. This EIS does identify the cumulative impacts resulting from the reasonably foreseeable actions of homeporting the BRAC CVN along with up to two additional CVNs at NASNI. The cumulative analysis in section 3.18 evaluates that alternative (in the case of NASNI, *Facilities for Two Additional CVNs: Capacity for Total of Three CVNs*) which would result in potentially the most adverse of environmental impacts for each CVN homeporting location. Please see response to comment L.4.11 for a discussion of the analysis of the BRAC CVN in the cumulative impacts assessment.

I.78.4 These comments are the same and in fact referenced to a consultant's letter attached to the City of Coronado's comments. See responses to comments L.4.56 through L.4.60 above.

November 25, 1998

Mr. John Coon, Project Manager
Southwest Division, Naval Facilities Engineering Command
Code 05AL-JC
1220 Pacific Highway
San Diego, CA 92132

Dear Mr. Coon,

These comments are submitted in regards to the DEIS for for the Developing Home Port Facilities for 3 Nimitz Class Carriers in Support of the U.S. Pacific Fleet in Coronado, CA.....and request they be placed in the official record. I just returned from an east coast sojourn, and I ~~respectfully~~ request that these comments be included in responses. I.79.1

The installation of monitoring systems for radiation and chemical releases are required along the boundry with Coronado and within Coronado. These should be monitored by Coronado officials or civilian resident volunteers from Coronado. A continual print out should be placed in the Coronado public library on current results.

When certain threshholds are reached that would be detrimental to the health of residents, a siren should sound with a number code to convey to residents the action that they should take, i.e.: close all windows and do not expose self to outside air or evacuate the area, etc. There is NO OTHER WAY to notify residents immediately of a health hazard. Notifying public officials in past accidents has not worked and will not work now.

There are normal radiation releases as a normal routine, and there may be higher than normal releases, each of which must be registered. With a 600% increase in chemical and hazardous waste storage at NAS North Island for a 10 year duration and even longer, if a disposal area is not established, there is a potential for air releases. There are air releases today of chemicals and heavy metals from processes currently taking place at NAS. These and any accidental releases have to be detected along with radiation releases, since both affect the health of residents.

Because of the U.S. Government and military cover-ups of the effects of the atom bomb tests, Agent Orange, the Desert Storm Health Syndrome and even putting a known military person in the unknown tomb, these agencies have no credibility in notifying the public should there be an accident or incident affecting public health. This includes the Navy! Therefore, it is imperative that the residents have there own monitoring stations or the Navy will soon feel the rath of those they ignore. It is human nature.

Conclusion: Navy provide monitoring stations with Coronado observers, with a central current display in the Coronado library, installation of sirens for immediate notification of accidents/incidents of radiation or chemical releases at any level, coded for necessary public response, all within the Coronado City area.

Sincerely,

Earle Callahan

860 Cabrillo Ave.
Coronado, CA 92118

Earle Callahan
CDR USN (Ret)

Comment Number	Response

Earle Callahan

I.79.1 Please see response to comment L.4.36 and O.12.81.



GaiaLINK

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October 29, 1998

I.80

I'm Marv Lyons, Founder of an organization called GaiaLINK. My mission is to link all people with each other and the living earth/system which sustains our lives. I.80.1

I do not speak for myself or for the people of Coronado; they are doing an excellent job of speaking for themselves..

I speak for all the people in the San Diego/Tijuana Region

I speak for all of the children...for many generations to come...

I speak for Gaia, the living earth, which provides us with our entire life support system..

You must be aware that you and your warships are a target... and make the entire region a most attractive target

- Think of terrorists from a fanatic sect... we saw them in NY
- Think of Oklahoma City and an angry American dissident
- Think of Chernobyl and the long term damage of nuclear fallout..
- Think of the devastation of Hiroshima...

We are here in discussion because these warships are not powered by common polluting internal combustion engines I.80.2

You/we are messing with the power of the sun... over which we have limited control; notwithstanding the high degree of commitment and training of the people operating the systems.

With the best people responsible, there is a possibility of an accident.

Nuclear ships make great profits for the builders. I.80.2

Nuclear warships may be the greatest macho power toys our clever species has yet invented. But the long term risks and problems in this game are too high.

I am not prone to paranoia or seeing enemies lurking in every shadowed doorway. But Terrorism is much in vogue these days as you know, because it doesn't take billions of dollars to do billions of dollars worth of damage. I.80.3

A terrorist attack could turn the San Diego/Tijuana region into a nuclear wasteland for generations to come — it would even mess with the tourist trade.

Alternatively, the residue of nuclear waste is one more example of our shortsighted technological cleverness — poisoning not only ourselves, but our entire life support system: the birds, the fish... the frogs. I.80.4

We, the citizens, have entrusted you and empowered you, with your proud blue uniforms, to defend us and create national security...

I believe it is time to re-examine the whole notion of **national security**...in the light of terrorism and the half-life of nuclear waste. We need a larger vision, a longer term, to frame our concept of national security. We are running out of other people's back yards... to dump waste in and the stuff doesn't stay put. It leaches out and contaminates water supplies and the soils we depend on for our very existence.

I respect you, your commitment to your job, and the past services of the U.S. Navy. Be aware that your proud blue coat and hard earned golden braid will not armor you against nuclear contamination and fallout or radiation sickness.

Are we willing to trade the short term image of national security for one group of humans — north americans — for serious, long term regional insecurity?

I implore you and all decision makers to re-consider your commitment to nuclear warships, particularly those in this area.

Most Sincerely,

Marv Lyons

Comment Number	Response

Marv Lyons

I.80.1 Please refer to responses L.4.44 and I.37.1 on the subject of terrorists and attacks on aircraft carriers in San Diego.

I.80.2 Our publicly-elected U.S. Congress and President of the United States make programmatic decisions regarding Naval ships (e.g., application of nuclear power), and thus comments regarding these decisions are beyond the scope of this EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

I.80.3 Please refer to responses L.4.44 and I.37.1 on the subject of terrorists and terrorist attacks on aircraft carriers in San Diego.

I.80.4 Please see response to comment I.80.2

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PUBLIC HEARING

DRAFT ENFIRONMENTAL IMPACT STATEMENT

FOR

DEVELOPING HOME PORT FACILITIES FOR

THREE NIMITZ-CLASS AIRCRAFT CARIERS

IN SUPPORT OF THE U.S. PACIFIC FLEET

CORONADO, CALIFORNIA

TUESDAY, OCTOBER 27, 1998

REPORTED BY MARILEE P. JEFFRIES, CSR NO. 7142

Fivecoat & With
Certified Shorthand Reporters, Inc.
701 B Street Suite 760
San Diego, California 92101

ORIGINAL

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CORONADO, CALIFORNIA, TUESDAY, OCTOBER 27, 1998

CAPTAIN DAVE O'BRIEN: Good evening, ladies and gentlemen. My name is Captain Dave O'Brien, Commanding Officer of the Naval Air Station at North Island. I'd like to welcome you to this formal hearing of the Department of the Navy's Draft Environmental Impact Statement for developing home port facilities for three NIMITZ-Class aircraft carriers to support the U.S. Pacific Fleet.

The purpose of this Environmental Impact Statement, or EIS, is to analyze the potential impact associated with construction and operation of the facilities and infrastructure needed to support home ports for three nuclear-powered aircraft carriers at four naval facility concentrations: San Diego, California; Bremerton, Washington; Everett, Washington; and Pearl Harbor, Hawaii.

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With me this evening are key members of the team who participated in preparation of the Draft EIS. They represent some of the specialized Navy activities involved in the project. Speaking tonight will be Captain Rockland Deal to my right, Commander Naval Air Force, U.S. Pacific Fleet. They operate the aircraft carriers. And to his right Mr. John Beckett from the Navy Nuclear Propulsion Program. They manage the nuclear propulsion program.

Tonight's meeting is being held as part of

the process prescribed under the National Environmental Policy Act, or NEPA. NEPA is our basic charter for evaluating potential environmental effects of federal actions. Under NEPA, federal agencies, in this case the Navy, must prepare an EIS for any major action that may significantly affect the quality of human environment. NEPA procedures are designed to make environmental information available to public officials and citizens and to receive input from officials and citizens before decisions are made or actions are taken.

The NEPA process for this project was initiated in December 1996, and in February 1997 four public scoping meetings were held in Bremerton and Everett, Washington; Pearl City, Hawaii; Coronado, California. Since then we have been busy preparing the Draft EIS.

On August 28th of this year, the Draft EIS was issued for public review. The availability of the Draft EIS was announced in local newspapers. Copies were distributed to agencies, organizations, individuals, and local libraries for public review. The 75-day public review period will run through November 12th, 1998.

The purpose of this public hearing is to describe the proposed actions and alternatives, to present the results of the environmental analyses contained in the Draft EIS, and to hear your comments about the Draft EIS. A total of five hearings just like this one are being held in Everett, Bremerton, Washington; Honolulu, Hawaii; and

San Diego and Coronado, California.

All oral and written comments on the Draft EIS received tonight and throughout the public review period will be considered and responded to by the Navy. The Draft EIS will then be revised as necessary to produce a complete and thorough discussion of the potential environmental consequences. The revised document which will include responses to all comments received during the comment period will become part of the final EIS.

Depending on comments received and the effort needed to address them, the final EIS will be completed in early 1999. When completed, the final EIS will be submitted to the Deputy Assistant Secretary of the Navy for Installations and Facilities as input to the decision making process. The document will then be subject to a public review period as required under NEPA. After this review period the Deputy Assistant Secretary of the Navy will consider any comments received and will sign a Record Of Decision which will document the final decisions and will complete the NEPA process. This action is expected in the spring of 1999.

Now, let me explain the procedures for making tonight's meeting productive and smooth. I hope that each of you have picked up one of the blue handouts that are available on the table near the door. It has the agenda for tonight's meeting on one side and a summary of the proposed actions and the environmental analysis on the other side. If you do not have one you may get one at the

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break, or if you would like one now, please raise your hand and we will pass one to you.

Also, please put your name and address on the white sign-in sheet on the table near the door if you wish to be included on the project mailing list. If you are on the mailing list you will be able to receive information about the project.

If you wish to speak during the public comment portion of tonight's meeting, I hope you have filled out a gray speaker request card, also available on the table near the door.

Also available on the table are a green handout which is a fact sheet summarizing the Navy Nuclear Propulsion Program, and copies of the Naval Nuclear 50th Anniversary brochure. Please help yourself to a copy of each of these if you wish.

Finally, if you wish to submit written comments and would like to have a handy form on which to write your comments, please pick up one of the yellow comment sheets. You may turn in your written comments tonight by placing them in the comment box near the door, or you may mail your comments to the address indicated on the back of the comment sheet before November 12. I assure you that written comments will get the same attention as oral comments.

The public comment portion of tonight's hearing is an opportunity for you to present your comments on the Draft EIS. We are not going to take up your time

to respond to each comment tonight. Responses to your comments will be in the final EIS. To ensure that we have reported all your comments, a transcript of this meeting will be prepared by our court reporter.

Now, let's get started. First we will describe NIMITZ-class aircraft carriers and the need for them to have home ports. Then we will explain what the proposed actions are and why they are being considered. Next we will explain the alternatives that are considered in the Draft EIS. Then we will briefly summarize the results of the environmental analyses. That will be followed by a discussion of the nuclear propulsion aspects of NIMITZ-class aircraft carriers. Following the presentation, which will take about 40 minutes, we will take a ten-minute break and then reconvene to receive your comments.

Now, to talk about NIMITZ-class aircraft carriers, homeporting, and the proposed actions, I would like to introduce Captain Rockland Deal from the staff of Commander Naval Air Force, U.S. Pacific Fleet.

CAPTAIN ROCKLAND DEAL: I chose this photograph of one of our carriers at sea with part of our air wing overhead to point out that this is what the proposed actions we are discussing tonight are really all about. They are about the efficient application of military power in support of the United States' national interests established by the President and Congress.

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It is my boss who is responsible for support for all of the aircraft and aircraft carriers in the Pacific Fleet. That adds up to 6 aircraft carriers, about 1600 airplanes, and more than 57,000 people who make it all work. They are out there every single day carrying out their mission somewhere in the world's largest ocean.

I represent the people who fly these airplanes and sail these ships, and it's we who need the home port facilities that we are talking about tonight.

In this part of our presentation I'll describe NIMITZ-class aircraft carriers, the major Pacific Fleet home ports, and some of the principal factors creating the framework for the decision of where to homeport aircraft carriers.

NIMITZ-class aircraft carriers are among the largest of the warships in the world. They are 1,092 feet long by 252 feet wide on the flight deck, and 134 feet wide at the water line. The flight deck encompasses 4.5 acres. They are also one of the deepest draft ships in the Navy, requiring a home port berth with a depth of 50 feet measured at mean lower-low water. The full crew complement while in home port is 3,217 personnel, which is roughly half the full operational crew complement of approximately 6,000 when the air wing is embarked at sea.

The aircraft and air wing personnel do not remain on the carrier while it is in home port. The air wing is typically based at several different Naval Air Stations. When the carrier goes to sea, the wing support

personnel and material are loaded at pierside, and the aircraft fly out to meet the carrier at sea.

The Pacific Fleet has facilities in many locations, but they are concentrated mainly in four geographic areas: Washington's Puget Sound in the Pacific Northwest; the San Diego area in Southern California; Pearl Harbor, Hawaii; and Yokosuka Japan. The naval facilities in these areas provide home ports for nearly all of the ships in the Pacific Fleet.

What is a home port? Each ship in the U.S. Navy has home port where it is based when not deployed. The crews' families generally live there; maintenance and material support are located there; facilities and quality of life infrastructure are provided there.

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The nuclear-powered aircraft carrier operates on about a 24-month cycle: They deploy overseas for six months; they undergo maintenance in the home port area for about six months; and they spend the remaining 12 months training for the next deployment. About four months of that training is spent at sea, so you can see that the crews get precious little time in home port with their families.

As indicated on this slide, the Navy designation for nuclear-powered aircraft carrier is CVN. A conventionally-powered aircraft carrier is called a CV. So when I use the term "CVN" in this presentation, I'm referring to a nuclear-powered aircraft carrier.

The Navy's proposed actions, which are the

subject of this EIS, are to construct and operate the facilities and infrastructure needed to support home ports for three CVNs.

Two of these CVNs will be joining the Pacific in 2002 and 2005 to replace two older conventionally-powered aircraft carriers, CVs. Let me emphasize that these two CVNs will replace two CVs and will not increase the number of ships in the Pacific Fleet. One of the CVs was decommissioned in September of this year, and a second CV is scheduled to be decommissioned in 2003.

The third CVN is the one homeported at Naval Station Everett. The Everett home port location is being revaluated in order to assess the potential to increase efficiency of support infrastructure and maintenance capabilities and to enhance quality of life for the crew.

The decisions on CVN home ports could also result in the need to relocate up to four Fast Combat Support Ships, or AOEs, currently homeported at Puget Sound Naval Shipyard if an additional CVN is homeported there.

Decisions on facilities development need to be made soon. This is important in order to program budgets in time to accommodate planned arrival dates of the two CVNs that will replace the aging CVs.

Currently designated CVN home ports are located at three Pacific Fleet naval facilities. Two of the home ports are in the Pacific Northwest area: Puget

Sound Naval Shipyard at Bremerton, Washington, and Naval Station Everett at Everett, Washington.

The third designated CVN homeport is in the San Diego area at Naval Air Station North Island in Coronado, California. North Island was only recently designated a CVN home port and just received a nuclear-powered aircraft carrier in August of 1998.

All three of the currently designated CVN home ports are considered in this EIS. In addition, because Pearl Harbor is a vital fleet concentration, it is also evaluated in this EIS as a potential CVN home port location.

The Navy determined specific locations for homeporting by examining the four existing ports just mentioned to determine how well they were capable of satisfying the following CVN home port objectives and requirements:

Operations and training;

Support Facilities;

Maintenance Facilities; and

Quality of life for Navy crew and families.

As I have stated, three CVNs are presently assigned to the Pacific Fleet. One is currently homeported at Bremerton, one is at North Island, and one is at Everett. Two additional CVNs will be joining the Pacific Fleet in coming years, bringing the Pacific Fleet total to five CVNs and one CV. The CV based in Yokosuka, Japan. The CV based at Yokosuka, Japan is not a topic of

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discussion tonight.

The EIS analysis assumes at least one CVN will continue to be homeported at Bremerton to comply with previous actions under the Base Realignment and Closure process, referred to as BRAC; at least one CVN will continue to be homeported at North Island to comply with previous BRAC actions; and (3) the remaining three CVNs will be homeported within the four alternative locations under consideration: Bremerton, Everett, North Island, and/or Pearl Harbor.

Because we were looking at four locations to homeport three CVNs with a different range of possible CVN berths at each location, a very large number of potential combinations were considered. We decided on the five combinations that presented a reasonable range of alternatives. These five combinations along with the alternative of no action became the six alternatives analyzed in the Draft EIS. The no-action alternative evaluates the impacts that would occur if no new facilities were constructed.

If you will look at the rows on this chart, you will see that North Island could have a total of one to three CVNs (the currently homeported CVN shown here in white, and possibly one or two additional CVNs shown in blue). Puget Sound Naval Shipyard could have one or two CVNs (the currently homeported CVN and possibly one additional CVN). Everett could have zero or two CVNs (the currently homeported CVN and possibly one additional CVN,

or possibly minus the currently homeported CVN). Pearl Harbor could either remain without a CVN or add one CVN.

Columns one through five represent what we call the action alternatives because they would involve the action of facilities construction in order to accommodate additional ships at those locations. In each case the column for each alternative totals five CVNs.

Each alternative also has four AOEs. The AOEs are currently homeported at Puget Sound Naval Shipyard. Under alternative one, with two CVNs at Puget Sound Naval Shipyard, the four AOEs would be moved to Naval Station Everett. Under alternative five, also with two CVNs at Puget Sound Naval Shipyard, two AOEs would remain at Puget Sound Naval Shipyard and two would be moved to Naval Station Everett.

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The sixth column is the no-action alternative. Note that even the no-action alternative has five CVNs. This is because the proposed action is not to decide how many aircraft carriers we should have in the Pacific Fleet; the action is to decide whether to construct the optimal facilities and infrastructure to support them. Since NEPA requires that an EIS evaluate a no-action alternative, we had to determine where to homeport three CVNs if no new facilities were constructed. Logic dictated that we would not move the CVNs currently homeported in North Island, Puget Sound Naval Shipyard, and Naval Station Everett. The rest of the solution was to locate one additional CVN at the existing transient

berth at North Island; locate one additional CVN at Puget Sound Naval Shipyard; and keep the AOEs at Puget Sound Naval Shipyard.

The Navy's preferred alternative is alternative two, which would home port two additional CVNs at Naval Air Station North Island and maintain Naval Station Everett as a CVN home port. The Navy's preference for this home port combination is based on North Island's accessibility to the sea and the training ranges; Pearl Harbor Naval Shipyard's inaccessibility to the training ranges and its lack of facilities to support a carrier air wing; and the operational and quality of life advantages of the existing CVN home port at Naval Station Everett and the assumption that depot maintenance for the CVN can be successfully completed without a significant adverse impact on crew quality of life or maintenance schedules and costs.

Now I will describe some of the construction needed for maximum development at North Island to provide home port facilities for a possible total of three CVNs. To achieve the necessary water depth of 50 feet, approximately 490,000 cubic yards of dredging would be required. The dredging material would be disposed of at a designated ocean disposal location approximately five miles southwest of North Island or at another location in accordance with permit conditions. The existing pier J/K would be demolished and reconstructed to provide required CVN berthing. Reconstruction of pier J/K is required to

maintain berth L as the transient CVN berth to support air wing training and battle group training for CVNs in the U.S. Pacific Fleet area of responsibility.

Approximately 1.2 to 2.5 five acres of dike area would be filled behind the pier. The fill material would be covered with a concrete cap to provide a transitional paved area to the other CVN berth facilities. Filling in the dike area would require establishment of a mitigation site to address the loss of shallow waters and eelgrass habitat. The mitigation would include the creation of new bay bottom and establishment of eelgrass beds with new enhanced intertidal and subtidal habitat. The mitigation site would be constructed adjacent to pier B at the western end of North Island. Approximately 50,000 cubic yards of sediment would be dredged to construct the mitigation site and would be in accordance with permit specifications and agency requirements.

The concrete wharf would be supported by concrete and steel piles, reinforced concrete pile capbeams and the deck slab. The wharf would provide steam, low-pressure compressed air, potable water, pure water, salt water, sanitary sewer, oil wastes, jet fuel and marine diesel fuel. Electrical utilities would include a new 4,160-volt substation.

Additional improvements would include relocation of the existing ferry/flag landing that accommodates personnel transportation across San Diego bay. Other improvements would include a CVN warehouse, a

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fleet support building, equipment laydown building, and lighting. Improvements to the security fence would also be needed.

The Draft EIS analyzes the potential environmental effects of the six alternatives. The analysis specifically addresses construction and operation of associated facilities and any dredging that may be required. The study also addressed significant issues identified during the public scoping process. The environmental issues that are addressed in the Draft EIS include the 17 issues listed on this slide. I will let you read through these and also point out transportation there includes traffic. Coronado expects your comments on the analysis. But we have accumulated thus far in the draft and for further study and analysis.

The EIS identifies potentially significant environmental impacts at some or all of the home port locations for the following issues: Marine biology, ground transportation, and general services and utilities. This chart summarizes the potentially significant impacts at each CVN home port location.

At Naval Air Station North Island, dredging and pier replacement, which would cause marine habitat and eelgrass habitat removal, would have significant but mitigable impacts on marine biology. These impacts would be associated with alternatives one, two, three and four, and would be mitigated by construction of a habitat mitigation area.

At Puget Sound Naval Shipyard, significant but mitigable impacts on marine biology could result from dredging and marine construction during the salmon out migration season and from construction of a confined disposal facility if needed. These impacts would be associated with all five of the action alternatives. Impacts on salmon migration could be mitigated by avoiding dredging and marine construction from mid-March through mid June. Impacts from construction of a confined disposal facility if needed potentially could be compensated by construction of a shallow water habitat. Also significant unavoidable impacts on general services and utilities would be associated with the no-action alternative at Puget Sound Naval Shipyard.

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At Naval Station Everett significant but mitigable impacts on marine biology could result from dredging and marine construction during the salmon outmigration season and during the Dungeness crab molting period. These impacts would be associated with alternatives one, four, and five and could be mitigated by avoiding dredging and marine construction from mid-March through mid-June. Under alternative four with two CVNs at Everett, increased local commuters would cause a significant but mitigable ground transportation impact. This impact could be mitigated by providing roadway improvements and by implementation of a trip reduction program.

At Pearl Harbor Naval Shipyard, significant

but mitigable impacts on ground transportation would occur with the homeporting of a CVN. This impact would be associated with alternatives three and five and could be mitigated by providing roadway improvements and by implementation a trip reduction program.

Now I would like to introduce Mr. Tom Beckett who will discuss the Naval Nuclear Propulsion Program.

MR. TOM BECKETT: Thank you, Captain Deal.

Good evening. You have probably seen it on CNN. Aircraft carriers give the president four-and-a-half acres of sovereign territory he can count on any time he needs it anywhere in the world. Fleet commanders agree nuclear power enhances the capability of an aircraft carrier. With high speeds, sustained endurance, tactile flexibility and mobility aircraft carriers can respond to crisis more quickly, arrive on station in higher state of readiness, and stay on station longer with less logistic support if they are nuclear powered.

Next slide, please.

Before I discuss the results of the Environmental Impact Statement radiological analysis, I would like to provide some background on the Navy's nuclear propulsion program.

Earlier this year we celebrated our golden anniversary. The brochures that Captain O'Brien referred to on the side table include some of the many kind words we received from the nation's leaders to mark this

occasion. If you haven't already done so, I hope you will take one on your way out tonight.

In the past 50 years the Navy has logged approximately 5,000 reactor years and 115 billion miles of steam safely and Worldwide operations on nuclear power. There has never been a reactor accident in that period nor has there been any release of radioactivity that's had a significant effect on the public or the environment.

Next slide.

The naval nuclear propulsion program standards and records surpass those of any other national or indeed international nuclear program. To validate compliance with our strict radiological control requirements we conduct environmental monitoring in operational areas including San Diego. Monitoring includes analyses of air, water, sediment and marine samples for evidence of radioactivity. Reports on the results of these environmental sampling programs have been published openly and annually since the mid-1960s. You may find this report in the Coronado Library. This is the current year's report of our environmental monitoring program.

There have been as many as 22 naval nuclear propulsion plants associated with nuclear powered war ships homeported in San Diego over the past 40 years. Independent surveys conducted by the Environmental Protection Agency and by other government agencies confirm the conclusions of the Navy's own environmental monitoring

program. Operations over this period have had no significant affect on the environment. This does not mean that radioactivity is not released from naval nuclear propulsion plants. What it does mean is that such releases are infrequent and small and are well below the limits established by federal law.

Next slide.

Naval reactors are different from and much more robust than their civilian counterparts. This slide shows the live fire shot tested that was conducted in 1987 on board U.S.S. THEODORE ROOSEVELT. You can see the plume of water behind the ship. The Navy intentionally detonated the equivalent of over 50,000 pounds of T.N.T. close to the hull. The reactor plant passed with flying colors. This should be no surprise because each reactor plant must be designed to meet the rigors of combat if they are to serve in war ships. In addition, naval nuclear plants must be designed to fit within the constrained volume of a war ship hull.

I'd like to point out that even on a ship as large as a nuclear powered aircraft carrier, over 6,000 sailors must live and work every day while deployed within 600 feet of the operating reactors. The design requirements that result from these operational necessities result in reactor plants that are exceptionally rugged and resilient. In addition, the reactors are simple and small being less than one-fifth the size of the typical commercial nuclear power plant.

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Thus naval reactors' designs enhance peacetime protection of the environment and the public under the benign conditions existing in a near port when the reactors are operated at low power or are shut down.

Next slide

I'd like to talk about emergency planning. Emergency preparedness is a normal part of ongoing Navy planning and training. The Navy plans cover a wide range of emergencies from events such as fires to less likely events such as severe weather to highly unlikely events including radiological emergencies.

Radiological emergency preparedness starts with continuous monitoring of radiological work by highly motivated and trained individuals to detect any abnormal condition. It includes detailed procedures thought out in advance and tested to deal with the abnormality. Because of the conservative design approach used in naval reactor plants and their facilities, the impacts from radiological emergencies would be localized and not severe. Consequently, emergency plans are based on using Navy resources to deal with the casualty. However -- and I would like to emphasize this -- the plans do include prompt notification of both state and local officials at the time of the casualty. Existing state and local government plans for ensuring protection of the public during general emergencies such as severe weather are sufficient for protection from the casualties resulting from naval reactor plants.

Next slide, please.

With that background and experience, let's discuss the Environmental Impact Statement's radiological analysis.

We performed detailed analyses looking at potential impacts to air, water, and sediment quality from a range of both normal operations and potential casualty situations. The analyses cover impacts to humans as well as to plant and animal life. Further, the analyses are conducted using internationally accepted methodology and use risk factors derived from the international commission on radiation protection. The methodology assumes that the risk to a given member of the public is higher than that to a facility worker or sailor. This accounts for more sensitive populations among the public such as children and the elderly.

Fatal cancers are reported, since fatal cancer is the commonly accepted measure of impact from radioactivity exposure. However, the analyses also cover non-fatal cancers and other health effects including genetic defects.

Next slide.

We use several conservative assumptions in conducting the risk analyses from both normal operations and hypothetical accidents. For example, we assume that the weather conditions exist which would maximize exposure to the public, and we assume that the radiological forced term which is used is greatly -- is much larger than the

source term actually available in the plants and facilities. If these conservatisms were removed from the analyses, we would find that the risks are many times lower than those that I am about to report.

For cumulative impacts we assume that all nuclear powered ships in the area are concentrated in the home port location. For North Island what this means is that we assumed as many as 12 naval reactor plants associated with the 10 submarines and 1 aircraft carrier in the area as the baseline, and then we evaluate it the impact of up to 16 reactor plants associated with 10 submarines and 2 CVNs, 3 CVNs for the cumulative total.

Next slide.

Let me digress a little bit at this point and talk about the potential for shipboard accidents. The evaluation of shipboard accidents reveals significant details about military capability and war ship design. Consequently it's discussed in a classified appendix to the Environmental Impact Statement. This classified appendix is not releasable to the public but has been provided to Environmental Protection Agency headquarters for review.

What we can state publicly about the analysis in the classified appendix is that all inclusions and environmental impacts are covered by the discussion of facility accidents contained in the unclassified sections of the Environmental Impact Statement. I would also like to point out that in addition to these analyses we have

conducted extensive classified analyses of the design of the NIMITZ-class reactor plant and had provided those to the Nuclear Regulatory Commission and its advisory committee on reactor safeguards for independent review. They have both concluded that these plants are safe. Each review, although not required by law, are part of the Navy's longstanding practice of obtaining independent consideration of important elements of nuclear propulsion design.

Next slide.

Now finally, here are the results of the radiological analyses of homeporting carriers at North Island. The average additional annual risk to a single member of the population within 50 miles of North Island from the cumulative impact of normal operations is less than one in one billion. And the cumulative risk from accident situations, in this case, a facility fire is less than one in seven hundred million.

Next slide, please.

I provide this slide to provide some perspective on those risks. You'll note some other risks associated with common everyday activities in this area. This supports our conclusion that the combined impact of operation of carriers in this area is much less than the risk associated with everyday life.

Next slide.

Finally, I'd like to show that this slide represents a Seal Team inspection, environmental

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inspection of U.S.S. NEVADA in her home port in Maine. I use this to illustrate our point that the conclusion from the Environmental Impact Statement is that there is no significant radiological impact from any of the homeporting alternatives.

I would now like to turn the program back over to Captain Deal.

CAPTAIN ROCKLAND DEAL: Before we begin the public comment portion of this hearing, we will take a ten-minute break. If you haven't done so already, this would be a good time for you to fill out and turn in the speaker request card or to pick up copies of handouts from the table by the door. Let me remind you, we have three handouts available. The handouts are color coded blue information sheets, green nuclear propulsion fact sheets, and yellow are written comment forms. In addition, there is a Naval Nuclear 50th Anniversary brochure that you are welcome to take. All of these handouts are available on the table near the door. During the break we will leave up on the projector of the slide to show you where to send your written comments.

Please return back to your seats in ten minutes, and we will begin the public comment portion of the hearing.

(A recess was taken.)

CAPTAIN ROCKLAND DEAL: All right. At this time we would like to hear your comments on the Draft EIS. You

need to know the things that we missed and areas for further research for further analysis because we want to make the right decision on homeporting these carriers. Again, we won't be responding to questions tonight, as frustrating as it may be for some of you and for some of us here. In order to hear from everyone and to gather the expertise to answer your questions completely and thoroughly we will do that in writing. Every comment whether oral or written will be answered to the best of our ability.

Please remember no homeporting decision has been or will be made until the NEPA process has been completed. Your comments will be recorded by our court reporter tonight to become part of the permanent record, part of the public record on the Environmental Impact Statement process.

Out of courtesy to elected officials and Government agency representatives speaking on behalf of our constituencies, we will take their comments first. We would like to hear from Coronado residents next and other individuals. If you wish to speak and have not yet turned in a gray speaker request card, please do so now. If you need a speaker request card, please hold up your hand and someone will bring one to you. After we have gone through all the cards provided to us, we will ask if anyone else wishes to speak and allow them the opportunity to do so.

When your name is called please step to the podium, state your name and spell your name for the court

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reporter. I will also identify the next speaker in advance so that he or she can move to the front of the room and be ready to follow the current speaker. Have courtesy to others that would like to speak. We request that you limit your comments to three minutes. We will use this red light on the table to signal when it is time to close your comments. When you have 30 seconds remaining, the red light will turn on. When your three minutes has ended, the red light will turn off. That will be your signal to close your comments so the next person may speak. If your comments cannot be condensed to three minutes, we encourage you to submit them in writing. Again, I'm sure you have comments, and we have people waiting to answer thoroughly.

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In the event you have comments you wish to enter after tonight's meeting you may submit that in writing by mailing them to us. The address is put up again, and it's on the yellow sheet, that information sheet. You may use the yellow comment sheet we have provided for that purpose or any other stationery that you want to use. We can accept written comments through November 12, 1998. And again, the address is on the yellow and the green handouts.

Now we are ready to begin to hear your comments on the Draft Environmental Impact Statement.

The first person to speak tonight will be Congressman Bob Filner and Dr. Edward Siegel will be next.

Congressman Filner.

CONGRESSMAN BOB FILNER: Thank you. Good evening. H.1.1
My name is Bob Filner, and I represent the 50th Congressional District, San Diego County and appreciate the meeting today.

I want to make comments on, one, the process that is being handled here, and second, substance of the Draft Environmental Impact Statement.

First, on the process, I did express to you earlier today I think a very great frustration and distress that this kind of meeting is not a dialogue; that is, people want to have answers; they want to have discussion. This is a most important issue for people's futures. There ought to be some dialogue and not just written answers four or five months later and nobody can read them or discuss them. As I told you this afternoon, Captain, I would offer my good services to have a community meeting anywhere in the county where there can be this give and take, and I will make that in writing and hope that you can and other Navy officials be there for a real discussion.

Second, in some degrees this whole process H.1.2
that you are doing is somewhat of a charade. I think people expect when there is an Environmental Impact Statement done someone is going to review it and certify it. That's what happens with private projects and most government agencies. I hope -- I think people should understand that with military matters the Environmental Impact Statement is self-certified. As you said, no

decision is made. Nobody can overrule you either. There is no higher body to review this impact statement than the Navy itself. So this will be certified by you as being consistent with whatever you said it was consistent with. So I think people should understand that. Let me make -- and I'm going to be introducing legislation in the next congress that says the military ought to be subject to the same certification processes that as the civilians are for their projects.

Let me make a couple of quick statements on the substance. Number one, the Draft Environmental Impact Statement from my reading does not contain full information necessary for the public to make an informed decision. There is denial of any accident record, for example, or emergency response plans that we can see there.

Several consultants that have been hired by the City of Coronado and others have testified that the information is in there where it's skimpy and does not allow for an independent discussion or analysis of the information.

Second, the DEIS did not respond to issues raised by the community in the scoping process. I think you understand that the scoping process where our concerns could be fully expressed. The Navy rejected most of those issues raised by the community including the environmental justice concerns of some communities. Nor did the Navy include any analysis of the real worst case accident that

is a breach of the reactor core.

Lastly the DEIS does not consider current or new information, does not consider findings of recent G.A.O. report that found that nuclear propulsion carriers were far more costly and provided no military advantage. I think the Navy needs to take a step back, reassess this entire project in light of the new analysis of the G.A.O.

I appreciate the time tonight.

DR. EDWARD SIEGEL: Yes. I'm metallurgist. I'd like to respond to Mr. Beckett's comments about resilient number one, rugged number two, and three, simple. I'm a graduate of (inaudible) whistle blower. (inaudible) After that P.S.A. (inaudible). After that incident (inaudible) agencies fired missile blower. After that (inaudible) combustion before it was (inaudible). I worked on INCO-182. (inaudible) weld alloy.

I want to say something up front. I understand you gentlemen are not brave enough -- I'm not trying to insult you -- to go down in nuclear submarine. People who go down in nuclear submarines (inaudible) are brave. But they are jockeys. I'm like the veterinarian. I can't teach you metallurgy. I'll talk a little more tomorrow night.

Embrittlement of alloys (inaudible). (inaudible) is like osteoporosis. So getting back to Mr. Beckett's comments, resilience to what? Not to shock.

H.1.2 H.1.3 H.1.4 H.1.4 H.1.5 H.1.6

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Not to mechanical shock. Not to time and temperature. Just quickly (inaudible).

Number two, rugged. Not to shock in any way.

Number three, simple, in no way.

To metallurgy of nuclear reactors alloys is very, very, very complicated.

So to conclude what I would like to say, there has been one major nuclear accident which I will pass around, I would just like these back. I'm interested in what the Navy's comment is about the EMERAUD. French nuclear submarine captain and nine crew members killed March 30th, '94. That's an INCO-182 explosion. I worked on many of these.

To conclude at the same time, statement and make it very briefly. Let's talk about over aging and embrittlement (inaudible). (inaudible) This is an SAIC fan that they gave out at the Miramar Air Show. Overaging embrittlement (inaudible) are generic. See how the blue is peeling away. That's the reason you and I don't look as good as we did 30 years ago. Over aging means accelerating.

Your cores are not lasting more than 20 to 25 years. They should have lasted 50. The reason is over aging. It is generic and endemic. My worry isn't as much as the STENNIS as it's with your whole submarines here.

Thank you for your time.

BETSY GILL: The late 1980s upper echelon Navy

officials decided to convert San Diego into a megaport concentrating West Coast naval activities in San Diego County. North Island being a main component would homeport three to four nuclear carriers plus be the site of a multitude of hazardous waste storage and maintenance facilities. As you stated, by law a change of that magnitude requires an Environmental Impact Statement. To prevent North Island's closest neighbor Coronado from understanding the magnitude of the impact, the Navy officials devised a strategy to understand the negative impacts on Coronado. The Navy prepared two massive Environmental Impact statements, in my opinion, the purpose being to mask the impacts and to justify a decision previously made. To avoid responsibility for the diminished quality of life in Coronado, the two impact reports concluded that North Island's major expansion caused no significant change in Coronado's traffic, air quality, noise, nor any increased risk to health.

Our City Council has finally hired independent experts to review this second EIS. Our jammed streets, particularly the northeast quadrant, our poor air quality and increased noise levels considered insignificant in your report do indeed have negative impacts on our quality of life.

How are we going to give any credibility to your health risk analysis when your traffic analysis was so grossly incorrect?

Having observed the whole Navy disclosure and

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public process since 1993, the entire process, the Environmental Impact Statements, the comment periods, the public hearings. This must be my fifth one, the promises to answer questions, I'm sorry gentlemen, they just appear to me a joke and sham. The failure of honest disclosure and the evasion of the facts during the past five years have caused many Coronado citizens, certainly myself, to disbelieve and distrust Navy statements and findings. It is unworthy of a Navy and institution previously held in high regard to pass the risk and the burden of its activities on the citizens of surrounding communities. Without even an acknowledgment of the negative impacts. I am not blaming you, but somewhere along the chain of command maybe high up nobody really looked at Coronado and understood how this expansion would affect our community. H.1.9

Thank you.

GAIL BRYDES: Thank you, Captain Deal, Captain O'Brien and Mr. Beckett. I'll confine my comments primarily to traffic, cumulative impacts and also a proposed alternative. H.1.10

In table 3.9-1 of this document, I want to point out a couple of things about this chart. First of all, the Coronado bridge is identified as a freeway, and it is said that this is from the Coronado general plan. This is not a fact. The Coronado general plan identifies the Coronado bridge as a principal arterial. I'd also like to point out the number of daily traffic volume

66,000. Please note that this is 1993 data, and it's out of date. This is the traffic flow map for the San Diego Association of Governments, and we are interested in this transportation corridor right here. You'll note that it is the most impacted local street and road in all of San Diego County. It carries over 75,000 vehicles a day. And those vehicles ingress and egress onto Coronado residential streets. You'll notice that the impact is even greater than it is on Harbor Drive. Harbor Drive only carries 70,000 vehicles a day, and that's not in front of residences. This is an existing condition. H.1.10

The data that's put forward in this EIS is 1993 data. It's approximately there. It's the average seven-day a week number. Where the actual numbers that we are dealing with in 1995 five day a week, and that's workday, is up over 81,000 vehicle trips a day. The impact on 3rd and 4th Street in Coronado during peak periods is level of service E and F. You can see between 5 and 8 a.m. 3rd Street is the most impacted. And in the afternoons it's 4th Street that's the most impacted.

With regard to the cumulative analysis the project area is identified here at Naval Station -- Naval Air Station North Island. The cumulative projects that were identified are all around the bay, and I would think that these projects might be appropriate to do a cumulative analysis perhaps for NTC or for Point Loma, but you'll notice the transportation corridor that serves this project right here, there are no projects. There is H.1.11

nothing cumulative in this transportation corridor. Not one project. And off the top of my head, I could name at least five of them. I'll put them on here so you can take a look.

First of all, the impact study for removal of the tolls on the Coronado bridge. We have got the Glorietta Bay master plan. We have got the Hotel Del master plan. You have got the coming of the convention center expansion and possibly a ballpark. And at the Naval Amphibious Base Coronado you have cumulative projects that have occurred over the last five years and will occur into the future. These are all past, present and reasonably future projects that we can expect. None of which have been identified under the cumulative impact analysis in this document. And I think that's a failure.

Now, with regard to the alternatives that were considered in the document, all of the alternatives were compared to the no action alternative, which puts two carriers at North Island, two at Puget Sound, one at Everett and none at Pearl Harbor. But among the other alternatives that were analyzed, there were no two carrier alternatives that were viable for N.A.S. North Island, and the reason the no-action alternative was flawed is because of utilities and general services at Puget Sound. However, if you combine the actions from six and five, what you come up with is another alternative which provides a viable two carrier alternative to NAS North Island, and that would be to put two AOEs at Puget Sound

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and two at Everett. This is an alternative that wasn't considered, and there wasn't a two-carrier viable alternative considered in this document.

With regard to cost, the proposed alternative costs less than the Navy's preferred alternative, which is this one, alternative two. So I would like to compare the proposed alternative with the Navy's preferred alternative. What you have is a cost savings of approximately $62 million which might be used to fund a bridge approach improvement for the City of Coronado. The proposed alternative meets the operational objectives, and not only does it not increase the environmental impacts, but actually would remove some of the environmental impacts on this community.

In closing what I would like to say is, I have heard that this is a rubber stamped decision on the part of the Navy. And I would like to encourage, since there has been probably a million dollars spent on this EIS, and what we find is the data is out of date, it's not factual, there is no cumulative analysis of the transportation impacts, and there is a viable two-carrier alternative that hasn't been explored. I would like to encourage the Navy leadership as well as our congressional representatives not to allow this document to be rubber stamped. I urge a look, a serious look at a viable two-carrier alternative for NAS North Island, and I would encourage the cost savings that are realized to be reinvested in this community as mitigation for the

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cumulative impacts of traffic on this small residential community.

It's time that the Federal Government steps up to the plate and takes financial responsibility for the impacts that it's brought.

Thank you for your time.

H.1.13

MARK ETHAN SMITH: My name is Mark Ethan Smith. That's M-a-r-k, E-t-h-a-n, S-m-i-t-h. I'm an eight-year resident of Coronado and a candidate for the Coronado City Council. I oppose this expansion of the Navy's program due to the many adverse impacts on Coronado and also to the high probability of a serious nuclear accident due to human error. It takes top quality people to run nuclear reactors safely, and the Navy cannot meet its recruiting goals for top quality people. This isn't the old problem of trying to compete with higher paying private industry. Due to the decline in our country's educational quality over the last few generations, private industry cannot meet its recruiting goals and has to import foreigners.

I would like to know exactly where and how the Navy thinks it can find the personnel to operate these reactors safely.

Thank you.

H.1.14

IRVING REFKIN: My name is Irving Refkin, R-e-f-k-i-n. I'm a resident of Coronado and have been for 18 years.

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I wouldn't have brought my children here, my wife here if I didn't think that it was safe. The nuclear submarines have been across the way for a long time. I'm hearing the things that I heard in 1940, "Not in my backyard; defend the country but do it from someplace else"; and you can't do it. You have got to have a fleet here in order to protect this area. I think that the Navy is doing a fine job in the way it's handing nuclear reactors, in handling the nuclear ships. We go there. We go around there. I feel safe. And I think the rest of the Coronadoans feel safe as well or we wouldn't be living here.

Thank you.

H.1.15

LARRY BROWN: My name is Larry Brown, B-r-o-w-n.

Gentlemen, the City Council sent you -- sent the Navy a letter dated February 5th, 1997 which contained comments on scoping the EIS for homeporting CVNs in Coronado. It was a comprehensive recitation of the city's -- the community's legitimate concerns, and we had hoped that Navy decision makers would take that into full account in drafting the EIS. Sad to say that was a false hope. This Draft EIS in many respects follows the patterns of the previous EIS for homeporting the STENNIS. Indeed it often quotes it verbatim, even though it's two years old, and it's incomplete, careless and insensitive mind set in important aspects of impact analysis, especially in regard to traffic impact and disregard of

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cumulative impacts particularly in incessantly ignoring the involvement of multiple CVs and other naval air station activities. This trivialization of community concerns is disturbing. We deserve better.

I believe that I'm a member of the majority of Coronado citizens that support the mission and the presence of North Island and other Navy activities in Coronado to include the acceptance of CVN homeporting here. I understand the operational and logistic considerations that make Coronado a preferred home port for these ships. That same majority, however, believes that Navy officials and the fleet command and that the Navy department levels' concerns need to change the way they think about recognizing the severely adverse secondary effects of Navy activities in Coronado and accepting Navy responsibility for reasonable mitigation. You have a chance to do this in the EIS, in this EIS, but the draft gives us scant confidence.

Thank you.

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EARL CALLAHAN: Good evening. My name is Earl Callahan. I live in Coronado about three blocks outside of North Island fence.

The EIS indicates the Navy has not had any radiation accidents and more or less assumes it will never have any accidents. Nothing is perfect, and there are reports the nuclear Navy has had Navy nuclear accidents, radiation accidents. The Navy has told us at the previous

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meetings here that the public will not be informed of all radiation and chemical accidents here at North Island. We therefore need in Coronado, outside the Navy fence radiation and chemical monitors. We also need an alarm system similar to the sirens at civilian nuclear plants. We do not want to be dependent upon the Navy to inform us. There is no way the residents could be informed immediately without an alarm system or monitoring system of their own. Immediate action may be necessary among the public at some time to save lives. Perhaps the Navy should provide these monitoring systems.

H.1.17

Thank you.

JOSEPH WEAVER: I am Joe Weaver. I live in Coronado.

H.1.18

I do not think the homeporting of carriers to the defense of this country should be decided by civilians of a small group like this. This should be decided by C.N.O. and the people there what is best for the defense of our country. Not for the convenience of people here. They talk about three homeported carriers.

I was here during World War II, and all around North Island there were piers and the carriers. There were much more people then, but of course we were fighting a war. I preferred not to fight that war, have our carriers dispersed and placed where they are best strategically now and not for the convenience of the people here.

We talk about the dangers. Everyone here took a greater risk just driving to this place than you have a risk from any nuclear radiation accident from these carriers. It is practically nil. That is not a big problem. There will be an impact, but we have had three carriers based here all along. These carriers are not that much more than we have always had. But we have poured in more hotels and everything else, and we have put up a bridge, and people can put two people in a car and they crowd our town. Try to go from one side of the town across Orange. Not Navy traffic coming to work at ten o'clock in the morning. These are the tourists and people from across the way. What should be done here is to let a C.N.O. and his staff do what is best for our country. And if you are so scared of your carriers, you have an option. You can move.

We do not have an option about defending this country. We have to do the best we can. We do not want to go back to fossil fuels. They do not have the endurance that a carrier has. Let's base the carrier where the C.N.O. says is best.

Thank you.

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NED FLOYD: Good evening, gentlemen. I am Ned Floyd, F-l-o-y-d.

This citizen is in favor of letting the Navy determine the best location for its nuclear carriers. If its Coronado, I would be proud of that. There are two

reasons for my thinking. First the Preamble of the Constitution provides that Congress and the Government shall provide a defense for the country and then to promote the well-being of the people. They had their priorities straight. The CVNs represent a marked enhancement in capabilities to protect us. And they do protect. As a quantum physicist, not a nuclear physicist, I have full confidence in the ability of the Navy crews to continue to operate nuclear plants without incidents. The second point is that the crews on these ships are our protectors.

I invite those that have views that differ from mine to please support these crews in their commitment and honor and aid them and welcome them to Coronado.

Thank you.

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MICHAEL DEDINA: I'm Michael Dedina, M-i-c-h-a-e-l, D-e-d-i-n-a.

I have to agree with Congressman Filner that it would be -- have been best if you had an interactive session where we would have -- I don't know if you gentlemen are engineers, but to answer the questions about what's on our minds here, which is the nuclear power plants on the carriers.

And I'm going to ask you some questions. I'm not a nuclear physicist. Don't know too much about it. But let me ask you a few things and hopefully some answers

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will be forthcoming in future meetings which will be interacted.

What emissions exist on an ongoing basis from nuclear power plants on the carriers? I don't even know if there are any.

Is there such a thing that every day, gee, it's just a small level, if it's okay?

What levels of particulates -- and I assume I am using the right word when I say particulates -- what levels of particulates emissions are considered normal?

What levels of particulates are considered sufficiently high to trigger an alert to the public?

What has been done to keep nuclear emissions from spreading to the community in case of a, God forbid, Pearl Harbor type emergency when our ships -- it happened to us before, you know, and Lord hope it never happens again; but if it does, the ships will be here. If they do we have to consider the lives of the people who live where I live in Imperial Beach, folks in National City, Chula Vista, Tijuana, San Diego and so forth.

What will happen to the population if, God forbid, that should happen?

And, you know, wars do happen. If there weren't such a case, you fellows wouldn't have a job.

Thank you very much.

FRED LORENZEN: My name is Fred Lorenzen, L-o-r-e-n-z-e-n. Coronado resident.

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I have a number of questions first, which I must represent concerns that I have.

I don't understand why the Navy when it first proposed the first CVN nuclear carrier why at that time didn't they indicate that they were going to request three nuclear carriers all together?

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And one question, when a carrier -- when a CVN is in port at a berth, are the nuclear reactors operating at the time?

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Is water used for cooling the reactors taken from the bay and discharged into the bay?

Of the four proposed CVN locations and the proposed alternatives for each one, why is North Island being singled out for three CVNs and potentially fewer CVNs at other sites? It doesn't seem fair.

H.1.24

If three CVNs are approved for North Island, what proportion of the CVN fleet would need to complete the Navy fleet will be based at North Island; that is, how many CVNs are there in existence?

H.1.25

It has been estimated that one -- that the nuclear reactors of one CVN are equivalent to two nuclear power plants. If we have three CVNs at North Island, that could be the equivalent to six nuclear power plants. Then add the six submarines across the bay, and each one is equivalent to a nuclear power plant; we have the equivalent of about 12 nuclear power plants in the bay area.

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The sad commentary of this whole nuclear mess

is that San Diego, and especially Coronado, is the big disappointment in the California Environmental Protection Agency decision to grant a permit for the Navy to construct and operate a toxic waste treatment plant. This permit was just issued a couple of months ago by the agency in California that's supposed to protect us and protect the environment.

This elementary school where we are meeting tonight is located within about one mile of the CVN berth is, and more importantly, within about one mile of the toxic waste treatment plant.

Remember that the law states for written comments responding to today's proposal should be postmarked November 12th.

Thank you.

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GINNA McDONNOUGH: Good evening. I'm a resident and business owner here in Coronado.

First of all I would just like to restate one thing that Congressman Filner said because I think it's important to note that the general accounting office, the government's own report of Congress of August 1998 states -- you guys can read it if you want -- that there is no military advantage to nuclear powered carriers over conventional carriers. And they operate at a cost of more than $8 billion.

So to me I don't really understand what the advantage is in any respect to any of these things.

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One of the things you showed up here was that we would be promptly notified of any accidents. I'd like to know how prompt prompt notification is. There was a release of radioactive steam up in Bremerton a month back and the public wasn't notified for 15 hours after the release. Too late to really do anything to detect afterwards, so the damage is already done, and the public was notified late.

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Why is it that accidents on board ships have been classified information. We have really nothing to go on. We don't even know how many accidents there have ever been on board a ship because that's classified information. I want to know. I don't know why that should be classified, especially if it is something that is going to affect us.

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I know you're experiencing a lot of my frustration. I've been involved in this probably the last three years in opposition to this, and as far as I'm concerned, this process has just been fraught with deception and lies on the part of the Navy.

H.1.30

The originally EIS was only scoped for one carrier even though I'm convinced that the Navy knew all along that they wanted to bring three here ultimately. But we were -- the original impact reports, one lady stated how it's based on information that is not even -- it doesn't even apply anymore.

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I'm sorry. I was making notes while everything was going on.

Also I -- some of those things were a little hard for me to read, your transparencies, but you stated that the only environmental impact would be on marine life and marine biology in this area. Well, there is a lot of human beings that live here too. It is not just the sea lions in the bay. There is a lot of people who are going to be dramatically affected by what you do. H.1.32

The traffic in this town is outrageous. And you can't tell me by bringing two more, three more maybe carriers here that the traffic is not going to get worse. And contrary to what some gentleman said about the tourists, it is not the tourists. There is a traffic problem in this town. It is the Navy. You are doing nothing to help us alleviate this. There is an item on our ballot in November that is a citizen's advisory vote about a tunnel to be built. Now, as far as I'm concerned, it is the Navy's traffic problem; the Navy should be helping Coronado deal with it. H.1.33

And that I'll talk more about the health effects tomorrow, and because I own and operate a health food store in this town, so I hear and know a lot of risks and sicknesses and stuff. Let's see. H.1.34

Also we were told originally, at least it was my understanding, there would be no shipbuilding and repair work to go in here. Well, apparently NASSCO has just been sold to General Dynamics, and I understand NASSCO has put in a bid to do shipbuilding repair.

We saw a plan that was in the administrative H.1.35

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record that showed a dry dock being built on North Island. H.1.35

Is that happening or not? Is this true?

And I want to know if that is going to be there because that means who knows what other carriers are going to come from someplace else to be built and repaired here too. That is something that may be here in the future, but is it going to affect us as well?

Also as far as the mixed waste storage facility, about three years ago, very nice captain, Captain Chamberlain was in charge of this project -- he is retired now, maybe he couldn't stand the heat, I don't know -- but anyway, he was giving us a little spiel about everything was going to be stored and treated there, and it was a huge facility; and I asked him at that time, well, if it's such a big facility what are you exactly going to do with it, and what his answer was to me was, oh, it is just going to be booties, tools, some contaminated equipment, not too big. And I said, well, if that's true, why do you need such a big facility? What's to stop other people or outlets from storing their waste and radioactive waste? He told me at that time, these are his exact words, "That will never happen." Well, if -- we come to find out, no, there is possibly 38 other facilities that are going to be storing their toxic radioactive and hazardous waste on North Island. All that is coming to our town by truck. H.1.36

Is this true or not? H.1.37

I guess the problem with me is I feel like we

have really been deceived through this whole process, that you have not been straight forward from the beginning. It would be in your best interest to tell us the truth, from the beginning tell us the truth. You wouldn't have this kind of problem. You wouldn't have citizens that are frustrated and angry and upset because we feel like our own government, oh, surprise, surprise, is lying to us.

Anyway, you're asking us to accept more traffic, more pollution, more hazardous waste, more harm to our future generations. This to me is unacceptable and I'm opposed to the project to begin with, but you'll hear from me tomorrow night.

Thank you very much.

H.1.37

H.1

BUD FOSTER: My name is Bud Foster. I'm a Coronado resident.

You can probably tell I'm a retired Navy captain. You may not know that I operated, supervised, repaired the Navy nuclear ships from 1959 to 1983, so I'm quite experienced. I also did training at Bettis, and I know that their job was not to whistle blow and make light of all the investments. That lab was very important to the Navy nuclear powers, and personally it hurts me to have someone who should have a striped shirt and be on a football field up here being proud of some other things.

Because I do admire the enthusiasm of the people, but because of my experience I would like to express my disappointment that this has been going on

H.1.38

three years as the previous speaker said. There have been open forums, the naval reactor's office, Rich Geeto (phonetic) has been here, has spent hours answering questions after giving a introduction. It has always hurt me that my next door neighbor stood up and told him, well, you can say anything you want to, but we are not going to believe what you say. I think you just heard that from the previous speaker.

I admire the fact that you naval officers and representatives can be there and take all this baloney.

H.1.38

I also live on 1st Street and three blocks from the carrier pier. So I experience what has also been talked about here as the traffic. From the list of things that are in the Environmental Impact Statement, I do not see that the effect on our community of the shipyard workers being here. Now even though they are only here for six months out of two years for one ship, I'm sure there will be other things that will go on. When we get the three ships here that means we may have as much as 5- or 600 shipyard workers working on those ships. I know that's a high side number, but that is a possibility. I would like to make sure that the impact statement addresses that. Mayor Golding Hearing addressed this by getting a ferry over. We talked about the temporary workers live over there at the ASK training center instead of traveling through our city every day.

Thank you.

H.1.39

SALLY FINCH: My name is Sally Finch. I'm a resident of Coronado. H.1.40

I'm speaking tonight not because I am opposed to another nuclear carrier on Coronado. The Navy has been a good neighbor, and they have an excellent safety record for their nuclear carriers.

I am speaking tonight because the Navy has completely and utterly failed to deal with the traffic consequences of another carrier in Coronado. Coronado is a city of only 25,000 people. It is a very small community with only local roads. You are talking about a carrier that has a home port crew of over 3,000 people. And to say that 3,000 additional people living in Coronado are not going to impact the traffic situation here, which is already obscene, greatly impacted, is preposterous to me. I don't know how the E.I.R. can describe the traffic impacts of this proposal as insignificant.

If the Navy wants to move ahead with this project, they need to come up with some mitigation measures to deal with the traffic problems.

Thank you.

H.1

JIM PEUGH: My name is Jim Peugh, P-e-u-g-h. I represent the San Diego Audubon Society. H.1.41

We have a real concern with the biological impacts of this project. The previous phase of the homeporting project has a new mitigation site on the north side of North Island. The eelgrass apparently is

mitigating the loss of eelgrass; however, it has its own environmental impact that's caused a loss of about a half a mile of intertidal habitat along the shoreline. About 30 feet wide by half a mile long. This habitat is important for shore birds for fish at high tide. They don't fly at the high tide, they swim up in the tides in the useless habitat and forage the invertebrates that help clean our water. I have actually gone and looked in the -- I have paddled over there myself, and the bird activity is significantly less than it is in the areas on both sides of the mitigation habitat just as you would expect from looking at it. H.1.41

But only a few hundred yards of natural shoreline in the north part of San Diego Bay, so even though the shoreline along North Island doesn't look very attractive, that's almost the best we have in the north part of the bay; so it's really important when we lose it.

Unfortunately the next phase the EIS looks like, you are just going to do the same. You are going to degrade or eliminate more intertidal habitat or eelgrass habitat. This is a violation of the Clean Water Act. I don't know how you got away with it the first time, and I certainly hope you don't get away with it another time.

The EIS that you have acknowledges upland habitat that says it isn't too good. It talks about the aquatic habitat, but it ignores the intertidal habitat. So I paddle over in my kayak to look, and sure enough, there is a shoreline between the upland and marine habitat

contrary to what the Environmental Impact Report suggests. H.1.41

I -- we urge that you assess the cumulative impacts of this project with respect to intertidal habitat; in other words, look at what the impact you have already knocked out, about half a mile of shoreline and now you are going to knock out some more. But why don't you look at the cumulative impact. We don't have much shoreline. H.1.42

We would also like you to expand this EIS to include mitigation for the shoreline habitat that was destroyed in the first phase of the homeporting project. We would like for you to change the mitigation plan that you have in the EIS plan you have now to either to do an eelgrass project that won't wipe out more intertidal habitat or to establish another mitigation site that will offset the loss of intertidal habitat that the eelgrass proposal you have will do.

And if you can't do these things, you know, take your ships somewhere else.

H.1

BEVERLY DYER: Good evening. I'm Beverly Dyer. I live here in Coronado. H.1.43

I have a number of questions I would like to have answered.

Why do we need the nuclear carriers to replace the ones we have when the officer we have states that they do not have enough money to support the present services nor to give them increases?

And since the ships are already sailing short-handed as has been stated by the Navy, up to 4- to 500, that they do not have in their -- how are we going to have that personnel to control the nuclear ship? H.1.44

Will there be enough qualified personnel to handle these?

As requires a great deal of knowledge about nuclear waste, will these be -- personnel be trained?

Where will they be trained, and for how long?

How will there their backgrounds and their ability be correctly checked, and by whom and what kind of statistics are you going to use?

What will these individual checkups amount to?

We have never been given and we would like to obtain information about the reasons for fully closing the Navy base at Long Beach and moving the facilities here. H.1.45

And what criteria was used by BRAC when they designated this?

It has never been told to us, so we do not understand.

Who do we hold responsible for making this decision to move these to Coronado and to close some of the large bases that were fully adequate?

May we have the names and designations of the individuals who decided this?

Or who is now making the decision?

And if we cannot have it, why not?

What did they personally gain serving on that committee? H.1.45

And what is the position of these people?

What is the Navy to gain by moving so much of their power to Coronado against -- right against the civilian homes locked into a bay that could be easily landlocked by an enemy? H.1.46

If Congress had responsibility of making decisions for our protection, why don't they have anything to say about this move just as our congressman had stated? H.1.47

Since nuclear power plants are being reduced, why is the Navy increasing nuclear ships? H.1.48

By concentrating power in Coronado, Puget Sound, Hawaii -- or Hawaii, you are setting ourselves up for foreign attack or internal attack. Think of Pearl Harbor. We are told terrorism today is one of our most greatest dangers that we have today. H.1.49

What protection are we proposing -- are you proposing to our local area in case of emergencies? H.1.50

Will you please please give our local residents information of your proposed decisions and protection for their use. H.1.51

Thank you very much.

HOWARD RUGGLES: My name is Howard Ruggles, R-u-g-g-l-e-s. I live in San Diego. H.1.52

Just a couple of comments. The reason for concentration on two ports on West Coast for the Navy's

ships, not only carriers, but we have ignored all the destroyers and cruisers and submarines that are on the bay elsewhere is budget driven. There was only enough money left in the budget at the time the decision was made to have two home ports on the east coast, Norfolk and Jacksonville; and two home ports on the West Coast, Puget Sound and San Diego. That's why Long Beach was closed. That's why everything in San Francisco was closed. It was all budget driven and still is. H.1.52

One comment that I will agree with almost everybody that has been up here, there is a hole in the chart that shows the five alternatives. It was kind of a greenish color. That one that said biology -- marine biology; in each of the alternatives, you should have listed transportation under the Coronado item because that is a major problem over here, has been, still is. Conventionally when we get all three carriers here together, it will be even worse. Luckily that won't happen still for a few years when CONSTELLATION -- right now we have two because we lost the KITTY HAWK to Japan. When CONSTELLATION goes away and gets decommissioned we will have our second nuclear carrier, so we will still be at the current level of activity; but finally when the third nuclear carrier arrives, you are going to have a step up of the number of people, number of cars, traffic and so on. So that's one thing you really need -- really does need to be looked at and hasn't been emphasized enough really. H.1.53

Thank you. H.1.53

JEFF WIEMANN: My name is Jeff Wiemann. Last name is W-i-e-m-a-n-n. I'm a Coronado resident and homeowner here, and have been for a couple years now. H.1.54

Also representing the greater San Diego Chamber of Commerce this evening and bring the full weight of the board of directors here today. They approve the Navy's plan to homeport additional carriers here in Coronado, but with the same line as they wanted to look at the transportation and traffic issues also.

I would also like to reiterate a couple of comments tonight. One of the things had to do with Congressman Filner said a statement on the environmental standards, the process for all of those facilities that do support the aircraft carrier, whether it be a hazardous waste facility or mixed wastes facility, follow California regulations, all the State regulations, federal regulations and everything, they have to go through that entire permitting process before being approved. Everybody says it is just a slam dunk and the Navy is going to close the door. That is not true. They have to follow the standards.

The other thing I want to talk about is what's a normal operating status of a nuclear aircraft carrier in port. Right now the status has been here for a while. Its reactor is shut down. The reactor when it comes into port is at a very very low level. It is H.1.55

differently designed than you would a commercial nuclear reactor. A commercial nuclear reactor is designed to start out at low power level and transition to 80 to 90 to 100 percent of its power, generate power for a long time and shut itself down and refuel. Nuclear reactor for ships are designed to go through various transitions to operate at low power levels and high power levels and up and down. When they come to port it is very low low levels. The accidents are very, very low. H.1.55

The other thing I would like to talk about is what is nuclear waste? Everybody is always saying this term here in Coronado and with the facility. The nuclear waste that we are talking about is the booties, the rags, the wrenches, and everything else that goes on with the general maintenance. How much waste is generated by an aircraft carrier in a year? Take an eight by eight foot cube, fill it up with the rags, the booties, the tools, and other things and that's the amount of waste generated by a nuclear carrier. I mean that puts it into perspective. H.1.56

You also talk about the Blue Book. How much total radiation is emitted into the atmosphere in the year by all the Navy's reactors. Does anybody know? If you look in the Blue Book, if you take the water displaced by a normal naval submarine, okay, envision an 8,000 ton, 9,000 ton submarine, take sea water, the natural recurring radiation in that sea water is more than is actually discharged by the Navy in its entire year; and that's H.1.57

H.1

reported in the Blue Book that was referred to earlier this evening.

Thank you.

H.1.57

H.1.58

DANI GRADY: My name is Dani Grady. I'm 40 years old. I was born and raised in Coronado.

I came here tonight, I have to be perfectly honest with you -- I'm actually -- I am a cancer survivor and I participate -- and I think it's very important that we support research in this country. A lot of things, low level radioactive nuclear waste, those are byproducts to me of our living in society.

I have been very fortunate to live in Coronado almost all of those 40 years. My father is a Navy -- an ex-fighter pilot for the Navy. And I do have to tell you that as I came here tonight to feel good about my decision to not be someone that says, "Not in my backyard"; and I have to tell you gentlemen that unfortunately I'm very disappointed because I really came here just to feel better about saying it's all right we have these carriers, but I have to agree with Representative Filner when he says that this process is tremendously flawed. Because I -- one thing for you to tell us -- to give us your lecture, but I came here to hear my neighbors and the people that live here in San Diego; and I wanted to hear what their comments were, and I wanted to hear your response.

So out of respect for your neighbors here who

H.1

H.1.58

are hosting the Navy here in Coronado and San Diego, please change this process where you have written questions and you have people that you need to respond to them somehow in an orderly fashion -- I understand people do become pretty heated -- but I have to tell you that tonight I'm leaving unfortunately suspicious of the process.

So I wanted to voice that to you tonight from someone who came here to support you, and now I have some questions. So please take that under consideration and for your process.

Thank you very much.

CAPTAIN ROCKLAND DEAL: I have no other speaker cards.

Does anyone else wish to speak this evening? Sir?

H.1.59

JACK SHAW: My name is Jack Shaw. I'm a resident of Coronado. S-h-a-w.

I have not read the Environmental Impact Statement. I certainly agree as I have talked to many of my friends the biggest impact of three carriers of any type homeported in Coronado is going to be traffic.

I would like to see a show of hands of people who served on nuclear powered ships. So like anything, the amount of real knowledge about things is very small. Because people have not done it. I have done it. I have

commanded nuclear powered ship. I have served nuclear powered task groups. Nuclear powered ships are safe. Steam accidents happen on all ships. We had a nice gentleman here from -- a whistle blower he said -- that said we have this terrible accident on this French nuclear powered submarine. It was a steam leak. Up until gas turbines, most of our ships were steam ships. And steam is a dangerous thing afloat, ashore, or anywhere. The gentleman who talked about top quality, and the fact, yes, the Navy is suffering a recruiting shortfall.

But let me tell you, there is no lack of top quality nuclear program. They get the best, they will, always have; and they will continue to do that. Mr. Callahan cited radiation accidents. I don't know what his definition is of a radiation accident is. If he put it in his paper, because he writes frequently in the paper, I would be happy to see what he says. I think that the emotionalism has taken over a lot of this argument. The emotionalism about nuclear power, not the emotionalism about the impact on the City of Coronado, the traffic, the shipyard workers and whatever are very factual things that need to be addressed by the Navy. At the same time nuclear power is safe, has been safe and will continue to be safe.

Thank you.

CAPTAIN ROCKLAND DEAL: Anyone else this evening?

All right. Thank you for your input. We

H.1

H.1.59

will you make the right decision. Again, the written deadlines for submission is 12 November.

Thank you.

(The public hearing was concluded at 9:52 p.m.)

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Coronado Hearing

H.1.1 The Navy has participated in many public meetings with regards to its CVN homeporting activities in the San Diego area. Most notably, the Navy has participated in ongoing monthly meetings, with members of the Coronado City government and members of the public ("Coronado-Navy Complex" meetings). These meetings are a forum where Navy officials, local officials, and members of the public discuss issues of mutual interest. In many cases, issues related to CVN homeporting have been discussed.

Regarding this NEPA process, the EIS contains detailed technical analyses of a large number of specialized resource areas. As such, the Navy relies on expertise within a wide range of technical disciplines to prepare the analyses, and to subsequently answer comments received during the review periods. These technical experts need sufficient time to develop responses to these comments for the administrative record, and thus it is essential for the Navy to first carefully listen and then take time to confer with those experts to respond accurately to the comments. This process for responding to public comments is consistent with the requirements of NEPA, and is also consistent with feedback the Navy has received in relation to past public hearings conducted under NEPA. It is important to note that all comments received on the Draft EIS are responded to in the Final EIS as required by NEPA, and the Final EIS is then re-circulated for another review period.

H.1.2 Consistent with guidance from the Council on Environmental Quality (CEQ) in 40 CFR Part 1503, the Navy solicited comments from any federal agencies that have jurisdiction by law or special expertise with respect to any environmental impact associated with the Draft EIS. Also, the Navy requested comments from appropriate State and local agencies who are authorized to develop and enforce environmental standards, as well as any interested or affected person. (See section 10 of the EIS).

NEPA was enacted to ensure federal agencies consider environmental impacts in their decision making. Decision discretion still resides with the individual federal agency based on consideration of all relevant factors, including mission requirements and cost. In this case the Navy, as the cognizant federal agency for the action, is responsible to make the final decision on the proposed action after input from other federal agencies and stakeholders has been obtained and considered.

H.1.3 The Navy's historical record of safe and responsible operation of nuclear powered warships is discussed in detail in Volume I, Chapter 7 of the EIS. This record shows a long and extensive history of the Program's activities having no significant effect on the environment. Since the inception of the NNPP almost

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half a century ago, there has never been a reactor accident associated with the Program, nor has there been a release of radioactivity that has had a significant effect on the public or the environment. The Navy reports all releases of radioactivity associated with the NNPP in its annual report entitled Environmental Monitoring and Disposal of Radioactive Wastes from U.S. Naval Nuclear Powered Ships and their Support Facilities. This report is prepared annually, and is provided to Congress and made available to the public. Relevant information from the report has been included and referenced as appropriate in the EIS in accordance with the implementing regulations of NEPA (40 CFR 1502.21). Copies of this and other reports were placed in local public libraries to aid public review during the EIS process.

As described in the annual report referenced in the EIS, twenty-six previous versions of that report, and the 1998 update of the report, the total long-lived gamma radioactivity in liquids released annually to all ports and harbors from all Naval nuclear-powered ships and supporting tenders, Naval bases and shipyards is less than 0.002 curies. This annual total includes any accidental releases of radioactivity that occurred during the year. For perspective, the total annual amount is less than the amount of naturally occurring radioactivity present in the seawater displaced by a single submarine, and is environmentally inconsequential. Since the total amount released was inconsequential, any individual release was also inconsequential, and was not subject to reporting, immediate or otherwise, by any regulatory requirements.

In addition, the Navy's plans for emergency response is included in section 7.5 of the EIS. The EIS states that emergency planning and emergency response is included as an integral part of ongoing NNPP operations to ensure the Navy is prepared to handle accidental releases of radioactivity. In the highly unlikely event of an emergency, the Navy would promptly notify State and local officials, and would communicate with those officials. Any action needed to protect the public would be handled by State and local officials using existing plans for emergencies from natural events, such as earthquakes or hurricanes.

Finally, it should be noted that the Navy has provided detailed responses to the analyses provided by consultants. Navy responses can be found in various locations throughout the EIS, including responses O.12.174-178, O.12.179-189, O.12.190, and O.12.191-197. After examining these responses to the comments provided, the Navy believes it has correctly assessed the radiological impacts associated with the proposed action, and thus no significant changes to the Draft EIS are deemed necessary.

H.1.4 Public concerns identified in the response to the Notice of Intent for this EIS and in scoping meetings are summarized in Volume 2, Appendix B, EIS Scoping Comment Issues. The Navy determined that some of the issues raised were not

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relevant to the EIS analysis and are identified in Section 1.6 of the Draft EIS. Executive Order 12898 sates that federal agencies shall identify "disproportionately high and adverse human health or environmental effects of its programs." The environmental justice section related to San Diego, section 3.17, discusses Coronado as the relevant sub-regional area, since this community is adjacent to, and closest to areas impacted by the proposed action. The community of Coronado is comprised of relatively few minorities and low income households (see Table 3.17-1 in the Final EIS). The Navy also considered communities affected by operations of normal radiological support facility operations within a 50-mile radius of the proposed action (see Appendix F in Volume 2). Based on this analysis, there is no reason to conclude that minorities or low income communities would be affected *disproportionately*. Any impacts from air quality, traffic, security, construction, earthquakes, and personnel loading would primarily affect the residents of Coronado; these impacts would also be less than significant, as discussed in the relevant sections of the Draft EIS. Finally, as indicated in section 3.10, air quality impacts were assessed for the San Diego region beyond Coronado and they would be below thresholds of significance and would therefore not be expected to increase respiratory or other illnesses.

Nuclear propulsion technology is among the most sensitive military technologies possessed by the United States and Congress has placed stringent limitations on foreign access to it under the Atomic Energy Act of 1954 (amended) and other federal statutes. As such, discussion of issues related to U.S. Naval reactor design and operation, including an analysis of postulated reactor accidents, is contained in a classified appendix. The classified appendix was provided to EPA headquarters for review. This approach is in accordance with the implementing regulations of NEPA (40 CFR 1507.3(c)) which specifically provide for the protection of classified information. EPA received the entire Draft EIS, including the classified appendix, conducted a review, and provided comments based on their review. The Navy has responded to those comments (see F.3 series). EPA had no comments on the classified appendix.

Every effort has been made to ensure that environmental impacts associated with homeporting are evaluated and reported in an unclassified fashion in the EIS, and thus all potential environmental impacts or conclusions discussed in the classified appendix are covered in the unclassified sections of the EIS. In addition to the above, NIMITZ-class aircraft carrier nuclear propulsion plant design was independently reviewed by the Nuclear Regulatory Commission (at the time of review it was by the Directorate of Licensing Division of the Atomic Energy Commission) and by the Advisory Committee on Reactor Safeguards. Both reviews concluded that consistent with the military necessity of these ships, NIMITZ-class aircraft carrier reactors could be safely operated.

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H.1.5 The GAO report referred to by the commentor pertains to the government's choice for the next generation of aircraft carrier propulsion plants. As described in the response to O.12.12, the scope of this EIS does not include decisions regarding Naval ships (e.g., application of nuclear power), and thus comments regarding these decisions are beyond the scope of this EIS.

However, because of the numerous errors and inaccuracies contained in the GAO report, the Department of Defense objected to the report. Specifically:

- The GAO report substantially understated the operational effectiveness of nuclear-powered aircraft carriers, and overstated the life cycle cost premium. The Chairman of the Joint Chiefs of Staff, the CNO, the Unified CINCs, the Fleet Commanders, and the operating fleet of our Navy are unanimous in their recognition of the added capability, mobility, sustainability, and flexibility nuclear power gives to the Navy's aircraft carriers. Nuclear power gives carriers unlimited range and endurance at high speed, increases capacity for weapons and aircraft fuel, and eliminates dependence upon the vulnerable logistics train for ship fuel. The result is operational flexibility, independence, and survivability the Navy needs in its carriers.

- The GAO report inappropriately compared the cost of modern nuclear-powered NIMITZ class carriers, such as the newest, USS HARRY S. TRUMAN (CVN-75), to smaller, older, less capable, conventionally-powered carriers, such as USS JOHN F. KENNEDY (CV-67). KENNEDY, which was designed over 40 years ago, does not meet today's Navy standards for ship capability, survivability, or habitability.

- The GAO report did not capture actual deployment practices for CVNs and CVs. In the last two years, 6 CVNs were called to make high speed, long distance (over 4000 nautical miles) transits to respond to national security crises. No conventional carriers made similar high speed, long-distance transits in this period.

H.1.6 Issues pertaining to French submarines are beyond the scope of this EIS. Issues pertaining to metallurgical embrittlement are responded to in answers to the commentors letter, I.63.

H.1.7 The Navy has not made a decision regarding the proposed action in this EIS. The Navy identified a preferred alternative in the Draft EIS so the public could review and comment upon that preferred alternative. The public will also have at least 30 days to review the Final EIS before the Navy makes a decision.

This EIS evaluates those environmental impacts resulting from the Navy's proposed action and alternatives. If the existing environmental quality of an

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area is already degraded, an EIS identifies what additional environmental effects would result if the proposed action were to proceed. The EIS evaluates only those environmental impacts resulting directly, indirectly, and cumulatively (in association with past, present, and reasonably foreseeable projects) from the proposed action.

The previous CVN Final EIS published in 1995 was challenged in regard to cumulative impacts and segmentation. The U.S. District Court for the Southern District of California concurred with the Navy's implementation of NEPA, and concluded that the Navy had not understated the potential effects of a larger project by preparation of two documents (segmentation). In an Order dated May 12, 1997, the Court stated, "Because the Court finds that no proposal to homeport three CVNs existed prior to the issuance of the Final EIS, the Final EIS's analysis of the possible cumulative impacts of potential additional home ports suffices under NEPA." See response to comment L.4.5 for additional information.

H.1.8 Your comments are noted and included in the Final EIS. The Navy does not agree with your general statement that the traffic analysis is incorrect. For detailed responses to comments submitted by the City of Coronado's traffic consultants, please see the responses to comments L.4.55, L.4.67 through L.4.74, L.4.82 through L.4.89, and L.4.90 through L.4.98.

H.1.9 Your comments are noted and included in the Final EIS. The Navy is aware of the Coronado's concerns.

H.1.10 The traffic analysis was based on intersection counts that were taken in August 1996 and average daily traffic volume information that was assembled in 1996 and 1997. Table 3.9-1 in the EIS has been revised to show the highest traffic volumes cited for each roadway in the various source references. For example, on the Coronado Bay Bridge the table shows an annual average volume of 71,000 vehicles per day. These more recent traffic data that were not available to the EIS preparer when the DEIS was initially prepared. The August 1996 traffic counts that were used to represent the existing conditions scenario reflect traffic conditions during the peak summer tourist/recreational season when there were two aircraft carriers in port. Follow-up counts taken in the fall of 1998 resulted in traffic volumes that were lower than the August 1996 volumes. It was determined, therefore, that it would be appropriate to use the August 1996 data to reflect the existing traffic conditions. This conclusion is consistent with the findings of the October 1998 draft report prepared by SANDAG titled "San Diego-Coronado Bridge Toll Removal Impact Study," which also used the August 1996 data to represent existing conditions. Please see response to comment L.4.12 and L.4.15.

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With regard to the existing traffic intersection data that were used, the traffic analysis was based on intersection counts that were taken in August 1996, which reflected current information when the EIS traffic study was initiated. The August 1996 traffic intersection counts that were used to represent the existing scenario reflect traffic conditions during the peak summer tourist/recreational season when there were two aircraft carriers in port. Follow-up intersection counts taken in the fall of 1998 resulted in traffic volumes that were lower than the August 1996 volumes. It was determined, therefore, that it would be appropriate to use the August 1996 data to represent the existing intersection traffic conditions. This conclusion is consistent with the findings of the October 1998 draft report prepared by SANDAG titled "San Diego-Coronado Bridge Toll Removal Impact Study," which also used the August 1996 data to represent existing conditions. Please see response to comments L.4.12 and L.4.15.

In addition, a follow-up traffic impact analysis was conducted to determine the impacts of project-generated traffic by using the traffic conditions for the year 2015 as the projected conditions scenario. The year 2015 projected conditions traffic volumes and levels of service were taken from the draft SANDAG report titled "San Diego-Coronado Bridge Toll Removal Impact Study." The year 2015 traffic projections represent future traffic conditions taking into account projections of population and employment growth in Coronado and the San Diego region, assuming that the bridge tolls continue to be charged (Scenario 2 from the report). Although the traffic volumes for the year 2015 projected conditions scenario are higher than what would be expected for the year 2005 when a third CVN would be homeported at NASNI, this scenario has been addressed to ensure that the level of anticipated growth and the cumulative traffic increases in Coronado have been considered. The analysis of the study area roadways and intersections for this scenario is summarized in the response to comment L.4.12 and in the EIS. Based on the criteria for significant impacts, the proposed action's traffic impacts would not be significant.

With regard to traffic impacts, the traffic analysis presented in the Draft EIS is based on the incremental increase in traffic that would occur as a result of the proposed action. The homeporting baseline has facilities at NASNI to accommodate two conventional aircraft carriers (CVs) and one nuclear carrier (CVN) for a total of three carriers, while Alternatives One, Two, and Three have three CVNs. The proposed action would not result in two additional aircraft carriers, but would simply create the capacity to homeport two additional CVNs at NASNI. As the number of personnel on the CVNs is greater than that on the CVs, the proposed action would generate approximately 27 additional vehicle trips during the peak hours and 150 trips throughout an average day, as outlined in the Draft EIS. The analysis indicates that a traffic increase of this magnitude would not be significant, even at locations that are currently operating at unacceptable levels of service E and F.

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H.1.11 The list of reasonably foreseeable projects included in the cumulative analysis has been increased to include the San Diego-Coronado Bridge, Seismic Retrofit Financial Plan, Glorietta Bay Master Plan, Hotel Del Coronado Master Plan, and Convention Center Expansion projects. Projects at Naval Amphibious Base have been reviewed by the Navy to identify those that are reasonably foreseeable and appropriate to this analysis. The revised cumulative analysis in section 3.18 incorporates these projects. No projects have been eliminated from consideration in order to allow for the most reasonable analysis possible.

H.1.12 The alternatives analysis considered a reasonable number of combinations of CVNs and relocated AOEs at the four home port locations. Not every mathematically possible alternative was evaluated, consistent with guidance the "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," printed in *Federal Register* Vol. 46, No. 55, 18026-18038, 3/23/81. While not included under one scenario for all four home port locations, the EIS has evaluated the environmental impacts of a total of providing capacity to homeport two additional CVNs in Coronado (Alternative 4), two CVNs and two AOEs at PSNS (Alternative 5), and one CVN and two AOEs at NAVSTA Everett (Alternative 5). By combining these analyses, one can assess the environmental impact of the additional alternative proposed in the comment. The net difference in costs for all home port locations under this additional alternative as compared to the preferred alternative is approximately $86.4M over 30 years, rather than the $62M identified in the comment. Any savings resulting from selecting one home port alternative over another would represent a cost avoidance. The funds would not be tangible savings from an existing budget that could be used for funding other regional improvements, particularly those that are not needed to address significant environmental impacts resulting from the proposed action.

The preferred alternative is not the least expensive alternative: it ranks third in costs.

H.1.13 The Navy respectfully disagrees with your conclusion that "this is a rubber stamped decision," [or that the EIS is] "not factual, there is no cumulative analysis of the transportation impacts, and there is a viable two-carrier alternative." The EIS presents analyses of a reasonable range of alternatives for providing capacity to homeport additional CVNs at the four potential homeporting locations. One of the alternatives (Alternative Four) would providing capacity for one additional CVN at NASNI. This combination of CVNs at NASNI (Facilities for One Additional CVN: Capacity for Total of Two CVNs) was evaluated in each of the environmental resource issue areas. Another combination of alternatives would provide for the capacity to homeport two additional CVNs at NASNI (Facilities for Two Additional CVNs: Capacity for Total of Three CVNs), reflected in Alternatives One, Two and Three. The EIS

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in section 2.3.3.1 clearly defines the differences in new construction needed to provide homeport facilities and capacity for these two different combinations of CVNs.

The EIS transportation analysis used the most up-to-date (1996) available information. The Final EIS text of the transportation has been revised to clarify that the existing conditions used to characterize Coronado traffic were based on counts taken in the summer of 1996 that reflect worst-case conditions during the tourist season, and were not based on 1993 traffic conditions. Additional projects have been added to the cumulative analysis with no change resulting in the overall cumulative impact conclusions. See the revised Final EIS text in section 3.18.

H.1.14 Please see response to comment O.12.86.

H.1.15 Your comments are noted and are included in the Final EIS.

H.1.16 Public concerns identified in the response to the Notice of Intent for this EIS and in scoping meetings are summarized in Volume 2, Appendix B, EIS Scoping Comment Issues. The Navy determined that some of the issues raised were not relevant to the EIS analysis and are identified in Section 1.6 of the Draft EIS.

H.1.17 Please see response to comment L.4.36 and O.12.33.

H.1.18 Your comments are noted and are included in the Final EIS.

H.1.19 Your comments are noted and are included in the Final EIS.

H.1.20 Please see response to comment H.1.1.

H.1.21 The radiological impacts of the NNPP are discussed in detail in section 7.4 of the EIS. For example, section 7.4.1 discusses the source of NNPP radioactivity, and section 7.4.2.2 discussed airborne radioactivity. In addition, Appendix F, section 3.1 and Tables F-6 and F-7 summarize the risk to human health from normal NNPP operations.

The EIS has evaluated a wide variety of accidents (including those addressed in the comment), including human health impacts within a 50 mile radius of North Island. Based on the analyses in the EIS, the Navy has determined that the radiological risks are not significant. A summary of radiological risks is contained in section 7.6 of the EIS.

H.1.22 Please see response to comment L.4.5.

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H.1.23 Typically, shore power is connected to the ship while in port. Accordingly, if the ship is in port and not moving, the reactor plant is normally shut down or operated at a small fraction of the ship's rated power.

While CVs and CVNs use different sources of fuel (oil vs. nuclear), both types of ships rely upon steam propulsion plants that require seawater cooling. As described in section 7.2 of the EIS, the primary system circulates water in an all welded, closed-loop system. The primary water is passed through steam generators, where it transfers its energy across a water-tight boundary to the water in the secondary system. The water in the secondary system also circulates in a closed loop, and in a manner similar to the way energy is transferred from the primary to the secondary system, transfers its energy to seawater.

H.1.24 The EIS has analyzed six alternatives coequally which included investigating no additional CVNs (Alternative Five), one additional CVN (Alternatives Four and Six), and two additional CVNs at NASNI (Alternatives One, Two, and Three). Any one of the six alternatives could be selected. The Navy identified a preferred alternative (Alternative Two) in the Draft EIS so that the public could comment on that preference before the Navy makes a decision. Appendix G of the EIS provides further information on this subject. Specifically, the Navy is trying to live within its infrastructure means. That means using existing Navy and facilities to the maximum extent practicable. NASNI has most of the infrastructure to handle three carriers, because that was NASNI's historical mission until USS RANGER was decommissioned in 1993. NASNI is not being singled out for three carriers, rather it is being looked at in terms of its existing capacity. The other locations cannot support more carriers than what is analyzed in the EIS because the overall capacity does not exist (housing, commissary, recreational facilities, etc.) and it would take a tremendous undertaking (like creating a new base) to support such an action.

H.1.25 There will be 12 carriers — six in the Pacific Fleet and six in the Atlantic Fleet. Therefore, if the preferred alternative is selected, 25 percent of all the carriers would be homeported at NASNI.

H.1.26 Contrary to the commentor's assertion, each NIMITZ class aircraft carrier reactor is less than one-fifth the size of a typical commercial power reactor. In addition, it is important to note that the results of all the radiological analyses in the EIS, which included cumulative effects, indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities under the proposed action.

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DTSC's decisions to permit Navy activities at North Island are not within the scope of this EIS.

H.1.27 Please refer to response to comment O.12.55 above.

H.1.28 Please see response to comment O.12.81.

H.1.29 The Navy's historical record of safe and responsible operation of nuclear powered warships is discussed in Volume I, section 7 of the EIS, where it is stated that there has never been a reactor accident, nor a release of radioactivity having a significant effect on the environment, in the 50-year history of the NNPP. Please also see response to comment O.12.33 and O.12.49.

H.1.30 Your comments are noted and are included in the Final EIS. The Navy believes the EIS presents factual and objective information.

H.1.31 This comment addresses the potential NEPA segmentation claims related to homeporting CVNs within the Pacific Fleet. A chronology of events resulting in the potential replacements for aircraft carriers planned for decommissioning in the San Diego area is provided to help the reader understand how NASNI has customarily been home port for three aircraft carriers.

In the 1980s, the Navy reduced the size of its active aircraft carriers from 15 to 12: six in the Atlantic Fleet and six in the Pacific Fleet. Before that time, NASNI had been the homeport for at least three aircraft carriers. In the early 1970s, this included USS TICONDEROGA, USS KITTY HAWK, and USS CONSTELLATION; in the mid-1970s, USS RANGER, KITTY HAWK, and CONSTELLATION; throughout the 1980s, RANGER, KITTY HAWK, and CONSTELLATION; and in the early 1990s, a combination of USS INDEPENDENCE, (while KITTY HAWK and/or CONSTELLATION were undergoing their Service Life Extension effort in Philadelphia, Pennsylvania), KITTY HAWK, CONSTELLATION, and RANGER. All ships listed above are or were conventionally powered carriers, or "CVs."

In 1993, RANGER was decommissioned at the end of its service life and removed from NASNI, temporarily reducing the port-loading to two CVs. In 1993, a Base Realignment and Closure Commission (BRAC) action resulted in the closure of NAS Alameda, California. Because there were no CVN homeport-capable berths at NASNI, the Navy was allowed to shift both NAS Alameda CVNs to the Pacific Northwest, pending completion of construction of suitable homeport facilities at NASNI. Those facilities were the subject of an EIS entitled *Environmental Impact Statement for the Development of Facilities in San Diego to Support the Homeporting of One NIMITZ Class Aircraft Carrier* (DON 1995a). The actual vessel that fulfilled the BRAC mandate and assumed the role of RANGER was USS JOHN C. STENNIS (CVN-74). Arriving in August 1998, STENNIS took

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over one CVs worth of facility support infrastructure at NASNI. NASNI has had the historical capacity to support three aircraft carriers.

In 1998, INDEPENDENCE (at that time the Navy's "forward deployed" carrier) reached the end of its service life and was decommissioned. KITTY HAWK was designated as its replacement and left NASNI in July 1998, 20 months after the Notice of Intent for this EIS, and relocated to Yokosuka, Japan. This resulted in a reduction of the port loading at NASNI to two homeported aircraft carriers. The USS NIMITZ is currently undergoing an extended maintenance period on the East Coast and will require a homeport berth within the Pacific Fleet area. Long range plans indicate that the most likely arrival date on the West Coast for NIMITZ would be early 2002. *Were the Preferred Alternative selected,* this would bring NASNI back to its historical three carrier port-loading baseline.

USS CONSTELLATION is expected to reach the end of its service life in approximately 2003. At that time, NASNI would once again experience a reduction in port loading to two homeported carriers *if the Preferred Alternative were selected by the Navy.* The same long range plans addressing NIMITZ also involve replacing CONSTELLATION with the USS RONALD REAGAN. It is anticipated this will happen in 2005. Once again, *if the Preferred Alternative were selected,* it would bring NASNI back to its historical three carrier port-loading baseline.

The closure of Naval Air Station (NAS) Alameda, California, and the relocation of two CVNs to fleet concentrations in San Diego and the Pacific Northwest were carried out in compliance with the 1993 Defense Base Realignment and Closure Commission (BRAC) recommendations. Consequently, the Department of the Navy constructed homeporting facilities for one CVN at NASNI (DON 1995a) and one at Puget Sound Naval Shipyard (PSNS), Bremerton, Washington (DON 1995b). New facilities were needed at NASNI in order to support the homeporting of a CVN, since prior to 1998, there had been no CVNs homeported there. At the time the Navy proposed the construction of facilities at NASNI to support a homeported CVN, the Navy prepared an EIS to present the analysis of potential environmental effects associated with that action. A Final EIS for that project was completed in November 1995. In this Final EIS, the Navy stated, "The proposed action of this EIS does not affect facilities and activities required for the two conventionally powered carriers (CVs) that are currently homeported in the San Diego area. However, as the older CVs are decommissioned, they will be replaced with newer CVNs. Therefore, a decision to establish the capability to support one CVN in the San Diego area makes it reasonably foreseeable that future decisions on where to homeport additional CVNs (CV replacements) beyond the year 2000 could result in their being proposed for homeporting in the San Diego area. This EIS, therefore, considers the potential cumulative environmental impacts of CV replacement and homeporting a total of three

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CVNs in the San Diego area. The Navy is not, however, developing proposals addressing where to homeport new CVNs beyond the year 2000 at this time. When the Navy does develop such a proposal, it will prepare the appropriate NEPA documentation." This statement was intended to provide public disclosure of reasonably foreseeable future actions that were not ripe for decision at that time. This is in accordance with 40 CFR 1508.7. The 1995 EIS also states, "This EIS, therefore, considers the potential cumulative impacts of CV replacement and homeporting a total of three CVNs in San Diego." See the 1995 EIS, Volume 1, Chapter 6 (DON 1995a).

The U.S. District Court for the Southern District of California evaluated the Navy's 1995 EIS with regard to the segmentation issue raised by the City. The District Court was aware of the Notice of Intent (December 1996) for this EIS before rendering its decision on the 1995 EIS in May 1997. The District Court concurred with the Navy's implementation of NEPA, and concluded that the Navy had not understated the potential effects of a larger project by preparation of two documents (segmentation). In a Court order dated May 12, 1997, the Court stated, "Because the Court finds that no proposal to homeport three CVNs existed prior to the issuance of the Final EIS, the Final EIS's analysis of the possible cumulative impacts of potential additional home ports suffices under NEPA."

H.1.32 The EIS does identify the effects on people. The EIS analyzes effects on the following environmental resources in addition to marine water quality and marine biology: topography, geology, and soils; terrestrial hydrology and water quality; sediment quality; terrestrial biology; land use; socioeconomics; transportation; transportation; air quality; noise; aesthetics; cultural resources; general services/access; health and safety; utilities; and environmental justice.

H.1.33 The additional traffic that would be generated by the proposed action would increase the traffic volumes on the Coronado streets that provide access to the site. As the maximum development proposed action scenario (Alternatives One, Two, and Three) would provide capacity to homeport two additional nuclear carriers (CVNs), the increase in personnel associated with the larger ships would result in a net increase of 27 vehicle trips during the peak hours and 150 trips throughout an average day. This increase in traffic volumes would not be significant based on the significance criteria outlined in the Draft EIS.

Although specific traffic-related mitigation measures are not needed to mitigate less than significant impacts of the proposed action, the Navy does have an ongoing series of strategies designed to reduce the level of traffic generated by NASNI, such as a ferry system, carpool/vanpool programs, installation of bicycle racks, a guaranteed ride home program (for rideshare users with a mid-day emergency), and an educational program to promote these strategies. In

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addition, the Navy is considering a redesign of the Main Gate so that the entrance would align with Third Street and thereby provide a more direct connection into and out of the base.

H.1.34 Your comments are noted and are included in the Final EIS.

H.1.35 Purchases of local shipbuilding companies by other defense contractors, and the fact that these defense contractors are pursuing bids on ship repair, are common business practice and are beyond the scope of this EIS.

The EIS addresses the dry dock issue in section 2.3.2.1. No dry dock is planned for NASNI.

H.1.36 Please see response to comment O.10.28. The facility Captain Chamberlain was referring to was the CIF.

H.1.37 Your comments are noted and are included in the Final EIS. Please see responses to comments O.12.8, O.13.3, O.13.5, and I.43.3.

H.1.38 Your comments are noted and are included in the Final EIS.

H.1.39 An average of 450 maintenance workers would be needed to support DMF maintenance activities for six month CVN PIAs at NASNI. Each CVN homeported at NASNI would require two six-month PIAs every six years. Thus, if three CVNs were homeported at NASNI, six PIAs would be conducted every six years, averaging one PIA per year.

In addition to PIAs, CVNs must undergo drydocking PIAs (DPIA) once every six years. These maintenance availabilities would be done outside of the San Diego area, and would last for approximately 11 months.

The BRAC EIS (DON 1995a) evaluated the traffic impact of DMF workers based on a one PIA in one year concept. The EIS determined that there would be no impact because of overall decreases in base population at NASNI. For example, NASNI has already experienced a decrease of about 2,500 personnel since the BRAC EIS was prepared over 4 years ago (see Volume 3, Table 2-1). While the BRAC EIS analyzed a lesser frequency of PIAs (two every six years), it did analyze what the impact of one PIA in one year would be, thus bounding the condition of this EIS where an average of one PIA each year would be conducted. Thus, the conclusion of no impact stated the BRAC EIS is still valid for this EIS.

Please also note that the 1995 BRAC EIS had several conservative aspects built into the analysis. (1) The 1995 BRAC EIS estimated the average DMF workforce at 750 personnel and assessed the impacts at this level. The Navy overestimated

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this workforce because there had been no actual experience in conducting a CVN PIA. Now that the Navy has conducted several PIAs, the average workforce number at NASNI has been lowered to 450 personnel. (2) The analysis in the 1995 BRAC EIS did not account for the fact that DMF workers average 2.5 persons per vehicle. The 1995 BRAC EIS assessed these workers as all single vehicle operators. Therefore the 1995 BRAC EIS conservatively assessed the number of DMF workers and bounded the impacts of one PIA per year in its analysis.

It should also be pointed out that the PIA is a maintenance activity for the CVNs that would essentially replace for maintenance overhaul activities that are currently performed on the CVs. The CV maintenance activities are conducted periodically by the Navy and contract personnel that must commute to NASNI during the maintenance periods. The amount of work for CVs and CVNs are similar in size; therefore, it is not expected that CVN PIA activities at NASNI would vary greatly from past CV maintenance activities at NASNI or result in traffic increases in Coronado.

Please note that the total amount of work between the old overhaul system and the new PIA maintenance system has not appreciably changed. While a PIA is 6 months in length, it is done once every 2 years. Under the old overhaul system it was not uncommon to perform multiple 3+ month SRAs during the same time period. The main advantage of the PIA system is that it affords the Navy a more even tempo of operations than the old overhaul system. Please also note that some recent NASNI CV SRAs have been nearly a year in duration as noted elsewhere in the City's comments. Because the total amount of work has not appreciably changed between the old overhaul system and the new PIA system, the Navy does not consider further analysis on this issue necessary.

H.1.40 The traffic analysis presented in the Draft EIS is based on the incremental increase in traffic that would occur as a result of the proposed action. The baseline condition has facilities at NASNI to support two conventional aircraft carriers (CVs) and one nuclear carrier (CVN) for a total of three carriers, while Alternatives One, Two, and Three have three CVNs. The proposed action would not result in two additional aircraft carriers, but would create the capacity to homeport two additional CVNs. As the number of personnel on the CVNs is greater than that on the CVs, the proposed action would generate approximately 27 additional vehicle trips during the peak hours and 150 trips throughout an average day, as outlined in the EIS. The analysis indicates that a traffic increase of this magnitude would not be significant.

Although specific traffic-related mitigation measures are not needed to mitigate less than significant impacts of the proposed action, the Navy does have an ongoing series of strategies designed to reduce the level of traffic generated by

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	NASNI, such as a ferry system, carpool/vanpool programs, installation of bicycle racks, a guaranteed ride home program (for rideshare users with a mid-day emergency), and an educational program to promote these strategies. In addition, the Navy is seeking a redesign of the Main Gate so that the entrance would align with Third Street and thereby provide a more direct connection into and out of the base.
H.1.41	This comment represents the public hearing transcript for James Peugh (San Diego Audubon Society – SDAS) and is therefore a summary of the SDAS letter. Please see responses to comments to that letter (O.11).
H.1.42	This comment represents public hearing transcript for James Peugh (San Diego Audubon Society – SDAS) and is therefore a summary of the SDAS letter. Please see responses to comments to that letter (O.11).
H.1.43	It is not within the scope of this EIS to examine the correctness from any point of view of building nuclear powered aircraft carriers. Notwithstanding the GAO analysis, the Defense Acquisitions Board (DAB) decided in September 1998 that CVX would be nuclear powered. This decision was based on a careful analysis of all pertinent data including the Department of the Navy's evaluation of tactical flexibility, operational and technical risks, and funding requirements of the various alternatives. For further detail, please see the response to comment H.1.5.
H.1.44	Please see response to comment O.12.86.
H.1.45	The information requested regarding the BRAC process is beyond the scope of this EIS.
H.1.46	The proposed action would not increase the numbers of aircraft carriers. Instead capacity would be provided to homeport up to two additional CVNs for a total capacity of 3 CVNs. NASNI has the current capacity of 1 CVN and 2 CVs. For a discussion of national security concerns in San Diego, please see the response to comment L.4.44.
H.1.47	This EIS was prepared pursuant to the National Environmental Policy Act, passed by Congress in 1969. The Department of the Navy is the lead agency authority to sign a Record of Decision for this EIS.
H.1.48	Your comment is not within the scope of this EIS.
H.1.49	Please refer to responses L.4.44 and I.37.1 on the subject of terrorists and terrorist attacks on aircraft carriers in San Diego.
H.1.50	Please see response to comment H.1.3.

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H.1.51 The preferred alternative is defined in the Final EIS. Please see response to comment H.1.50. The final decision will occur not less than 30 days after the public has had an opportunity to review the Final EIS. There will be no decision until the ROD is published.

H.1.52 Your comments are noted and are included in the Final EIS.

H.1.53 The traffic analysis presented in the Draft EIS is based on the incremental increase in traffic that would occur as a result of the proposed action. The baseline condition has facilities at NASNI to support two conventional aircraft carriers (CVs) and one nuclear carrier (CVN) for a total of three carriers, while Alternatives One, Two, and Three have three CVNs. The proposed action would not result in two additional aircraft carriers, but would create the capacity to homeport two additional CVNs. As the number of personnel on the CVNs is greater than that on the CVs, the proposed action would generate approximately 27 additional vehicle trips during the peak hours and 150 trips throughout an average day, as outlined in the EIS. The analysis indicates that a traffic increase of this magnitude would not be significant. Please refer to response to comment L.4.12 and Table 3.9-4 in the Final EIS, Volume 1.

Although specific traffic-related mitigation measures are not needed to mitigate less than significant impacts of the proposed action, the Navy does have an ongoing series of strategies designed to reduce the level of traffic generated by NASNI, such as a ferry system, carpool/vanpool programs, installation of bike racks, a guaranteed ride home program (for rideshare users with a mid-day emergency), and an educational program to promote these strategies. In addition, the Navy is considering a redesign of the Main Gate so that the entrance would align with Third Street and thereby provide a more direct connection into and out of the base.

H.1.54 Your comments are noted and are included in the Final EIS.

H.1.55 Although no specific issues were noted by the commentor, the Navy notes the commentor's general opinion regarding the proposed action.

H.1.56 Although no specific issues were noted by the commentor, the Navy notes the commentor's general opinion regarding the proposed action.

H.1.57 Although no specific issues were noted by the commentor, the Navy notes the commentor's general opinion regarding the proposed action.

H.1.58 Your comments are noted and are included in the Final EIS.

The Draft EIS public hearing procedures are prescribed by the Council on Environmental Quality Implementation of Procedural Provisions; Final

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	Regulations Guidelines under the National Environmental Policy Act passed by Congress in 1969. The public hearing process is a formal one in which comments are taken from the public. The public hearing process does not facilitate a dialogue. Comments provided during the public hearing and written comments provided within the public comment period are formally addressed in a Final EIS. Please see response to comment H.1.1 above.
H.1.59	Your comments are noted and are included in the Final EIS.

H.2

PUBLIC HEARING

DRAFT ENFIRONMENTAL IMPACT STATEMENT

FOR

DEVELOPING HOME PORT FACILITIES FOR

THREE NIMITZ-CLASS AIRCRAFT CARIERS

IN SUPPORT OF THE U.S. PACIFIC FLEET

SAN DIEGO, CALIFORNIA

WEDNESDAY, OCTOBER 28, 1998

REPORTED BY MARILEE P. JEFFRIES, CSR NO. 7142

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ORIGINAL

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SAN DIEGO, CALIFORNIA, WEDNESDAY, OCTOBER 28, 1998

CAPTAIN DAVE O'BRIEN: It's seven o'clock, so we are going to go ahead and get started.

Good evening, ladies and gentlemen. My name is Captain Dave O'Brien. I am Commander of the Naval Air Station at North Island. I'd like to welcome you to the Department of the Navy's Draft Environmental Impact Statement for determining home port facilities for three NIMITZ-class aircraft carriers in support of the U.S. Pacific fleet.

The purpose of this Environmental Impact Statement, or EIS, is to analyze the potential impacts associated with construction and operation of facilities and infrastructure needed to support home ports for three nuclear-powered aircraft carriers at four Naval facility concentrations: San Diego, California; Bremerton, Washington; Everett, Washington; and Pearl Harbor, Hawaii.

With me this evening are key members of the team who have participated in preparation of the draft EIS. They represent some of the specialized Navy activities involved in the project. Speaking tonight will be Captain Rockland Deal to my right. They operate the aircraft carriers. And Mr. Tom Beckett to his right from the Naval Nuclear Propulsion Program. They manage nuclear propulsion for the Navy.

Tonight's meeting is being held as part of the process prescribed in the National Environmental

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Policy Act, or NEPA. NEPA is our basic charter for evaluating potential environmental effects of federal actions. Under NEPA Federal agencies, in this case the Navy, must prepare an EIS for any major action that may significantly affect the quality of the human environment. NEPA procedures are designed to make environmental information available to public officials and citizens and to receive input from officials and citizens before decisions are made and actions are taken.

The NEPA process for this project was initiated in December 1996, and in February 1997 four scoping meetings were held in Bremerton and Everett, Washington; Pearl City, Hawaii; Coronado, California. Since then we have been busy preparing the draft EIS.

On August 28th of this year the draft EIS was issued for public review. The availability of the Draft EIS was announced in local newspapers. Copies were distributed to agencies, organizations, individuals, and local libraries for public review. The 75-day public review period will run through November 12, 1998.

The purpose of this public hearing is to describe the proposed actions and alternatives, to present the results of the environmental analyses contained in the Draft EIS, and to hear your comments about the Draft EIS. A total of five hearings just like this one are being held in Everett and Bremerton, Washington; Honolulu, Hawaii; and San Diego and Coronado, California.

All oral and written comments on the Draft

EIS received tonight and throughout the public review period will be considered and responded to by the Navy. The Draft EIS will be revised as necessary to produce a complete and thorough discussion of the potential environmental consequences. The revised document, which will include responses to all comments received during the comment period will become the final EIS.

Depending on comments received and the effort needed to address them, the final EIS may be completed in early 1999. When completed, the final EIS will be submitted to the Deputy Assistant Secretary of the Navy For Installations And Facilities as input to the decision-making process. The document will then be subject to a public review period as required under NEPA. After this review period, the Deputy Assistant Secretary of the Navy will consider any comments received and will sign a record of decision, which will document the final decisions and will complete the NEPA process. This action is expected in the spring of 1999.

Now, let me explain the procedures for making tonight's meeting productive and smooth. I hope that each of you have picked up one of the blue handouts that are available near the door. It has the agenda for tonight's meeting on one side and the summary of the proposed actions and the environmental analysis on the other side. If you do not have one, you may get one at the break, or if you would like one now, please raise your hand and we will pass one to you.

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Also, please put your name and address on the white sign-in sheet at the door if you wish to be included on the project mailing list. If you are on the mailing list, you will be able to receive information about the project.

If you wish to speak during the public comment period of tonight's meeting, I hope you filled out a gray speaker request card, also available on the table near the door.

Also available on the table are a green handout which is a fact sheet summarizing the Navy Nuclear Propulsion Program, and copies of the Navy's Nuclear 50th Anniversary brochure. Please help yourself to a copy of each of these if you wish.

Finally, if you wish to submit written comments and would like to have a handy form on which to write your comments, please pick up one of the yellow comment sheets. You may turn in your written comments tonight by placing them in the comment box on the table near the door, or you may mail the comments to the address indicated on the back of the comment sheet before November 12. I assure you that written comments will get the same attention as oral comments tonight.

The public comment portion of tonight's hearing is an opportunity for you to present your comments on the Draft EIS. We are not going to take up your time trying to respond to each comment tonight. Responses to your comments will be in the final EIS. To ensure that we

have recorded all of your comments, a transcript of this meeting will be prepared by our Court Reporter.

Now, let's get started. First we will describe NIMITZ-class aircraft carriers and the need for them to have home ports. Then we will explain what the proposed actions are and why they are being considered. Next we will explain the alternatives that are considered in the Draft EIS. Then we will briefly summarize the results of the environmental analyses. Then that will be followed by a discussion of the nuclear propulsion aspects of NIMITZ-class aircraft carriers. Following the presentation, which will take approximately 40 minutes, we will take a ten-minute break and reconvene to receive your comments.

Now to talk about NIMITZ-class aircraft carriers, homeporting, and the proposed actions, I would like to introduce Captain Rockland Deal from the staff of the Commander Naval Air Force, U.S. Pacific Fleet.

CAPTAIN ROCKLAND DEAL: I chose this photograph of one of our carriers at sea with part of its air wing overhead to point out that this is what the proposed actions we are discussing are really all about. They are about the efficient application of military power in support of the United States national interests established by the President and the Congress.

It is my boss who is responsible for support for all of the aircraft and aircraft carriers in the

Pacific Fleet. That adds up to six aircraft carriers, about 1600 airplanes, and more than 57,000 people who make it all work. They are out there every single day carrying out their mission somewhere in the world's largest ocean.

I represent the people who fly these airplanes and sail these ships, and it's we who need the home port facilities that we are talking about tonight.

In this part of our presentation I'll describe NIMITZ-class aircraft carriers, the major Pacific Fleet home ports, and some of the principal factors creating the framework for the decision on where to homeport aircraft carriers.

NIMITZ-class aircraft carriers are among the largest warships in the world. They are a 1,092 feet long by 252 feet wide on the flight deck and 134 feet wide at the water line. The flight deck encompasses 4.5 acres. They are also one of the deepest draft ships in the Navy requiring a homeport berth and depth of 50 feet measured at mean lower-low water. The full crew complement while in home port is 3,217 personnel, which is roughly half the full operational crew complement of approximately 6,000 when the air wing is embarked at sea. The aircraft and air wing personnel do not remain on the carrier while it is in home port. The air wing is typically based in several different naval air stations. When the carrier goes to sea, the wing support personnel and material are loaded at pierside, and the aircraft fly out to meet the carrier at sea.

The Pacific Fleet has facilities in many locations, but they are concentrated mainly in four geographic areas: Washington's Puget Sound in the Pacific Northwest; San Diego area in Southern California; Pearl Harbor, Hawaii; and Yokosuka, Japan. The naval facilities in these areas provide home ports for nearly all of the ships in the Pacific Fleet.

What is a home port? Each ship in the U.S. Navy has a home part where it is based when not deployed. The crew's families usually live there; maintenance and material support are located there; facilities and quality of life infrastructure are provided there.

The nuclear powered aircraft carriers operate on about a 24-month cycle: They deploy overseas for six months; they undergo maintenance in the home port area for about six months; and they spend the remaining 12 months training for the next deployment. About four months of that training is spent at sea, so you can see that the crew has precious little time in home port with their families.

As indicated on this slide, the Navy designation for a nuclear-powered aircraft carrier is CVN. A conventionally powered aircraft carrier is called a C.V. So when I use the term "CVN" in this presentation, I'm referring to a nuclear powered aircraft carrier.

The Navy's proposed actions, which are the subject of this EIS, are to construct and operate the facilities and infrastructure needed to support home ports

for three CVNs.

Two of these CVNs will be joining the Pacific Fleet in 2002 and 2005 to replace two older conventionally powered aircraft carriers, CVs. Let me emphasis that these two CVNs will replace two CVs and will not increase the number of ships in the Pacific Fleet. One of the CVs was decommissioned in September of this year. The second C.V. is scheduled to be decommissioned in 2003.

The third CVN is the one homeported in Naval Station Everett. The Everett home port location is being reevaluated in order to assess the potential to increase efficiency of support infrastructure and maintenance capabilities and to enhance quality of life for the crew.

The decisions on CVN home ports could also result in the need to relocate up to four Fast Combat Support Ships or AOEs currently homeported at Puget Sound Naval Shipyard if an additional CVN is homeported there.

Decisions on facilities development need to be made soon. This is important in order to program budgets in time to accommodate planned arrival dates of the two CVNs that will replace the aging CVs.

Currently designated CVN home ports are located at three Pacific Naval Facilities. Two of the home ports are in the Pacific Northwest area; Puget Sound Naval Shipyard at Bremerton, Washington, and Naval Station Everett in Everett, Washington.

The third designated CVN home port is in the San Diego area at Naval Air Station North Island in

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Coronado, California. North Island was recently designated a CVN home port and just received the nuclear-powered aircraft carrier in August of 1998.

All three of the currently designated CVN home ports are considered in the EIS. In addition, because Pearl Harbor is a vital fleet concentration, it is also evaluated in this EIS as a potential CVN home port location.

The Navy determined specific locations for homeporting by examining the four existing ports just mentioned, to determine how well they were capable of satisfying the following CVN home port objectives and requirements.

Operations and training;

Support facilities;

Maintenance facilities; and

Quality of life for Navy crew and families.

As I have stated, three CVNs are presently assigned to the Pacific Fleet. One is currently homeported in Bremerton, one is at North Island, and one is at Everett. Two additional CVNs will be joining the Pacific Fleet in coming years, bringing the Pacific Fleet total to five CVNs and one CV; the CV being in Yokosuka, Japan. The CV home port at Yokosuka is not affected by any decisions in this Environmental Impact Statement.

The EIS analysis assumes: One, at least one CVN will continue to be homeported at Bremerton to comply with previous actions under the Base Realignment and

Closure process, referred to as BRAC; two, at least one CVN will continue to be homeported at North Island to comply with previous BRAC actions; and three, the remaining three CVs will be homeported within the four alternative locations under consideration; Bremerton, Everett, North Island and/or Pearl Harbor.

Because we are looking at four locations to homeport three CVNs with a different range of possible CVN berths at each location, a very large number of potential combinations were considered. We decided on the five combinations that presented a reasonable range of alternatives. These five combinations, along with the alternative of no action, became the six alternatives analyzed in the Draft EIS. The no-action alternative evaluates the impacts that would occur if no new facilities were constructed.

If you will look at the rows on this chart, you will see that North Island could have a total of one to three CVNs, the currently homeported CVN is shown here in white and possibly one or two additional CVNs shown in blue. Puget Sound Naval Shipyard could have one or two CVNs, the currently homeported CVN and possibly one additional CVN. Everett could have zero to two CVNs, the currently homeported CVN and possibly one additional CVN, or possibly minus the currently homeported CVN. Pearl Harbor could either remain without a CVN or add one CVN.

Columns one through five represent what we call the action alternatives because they would involve

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the action facilities construction in order to accommodate additional ships at those locations. In each case the column for each alternative totals five CVNs. Each alternative also has four AOEs. The AOEs are currently homeported at Puget Sound Naval Shipyard. Under alternative one, with CVNs at Puget Sound Naval Shipyard, the four AOEs would be moved to Naval Station Everett. Under alternative five, also with two CVNs at Puget Sound Naval Shipyard, two AOEs would remain at Puget Sound Naval Shipyard and two would be moved to Naval Station Everett.

The sixth column is the no-action alternative. Note that even the no-action alternative has five CVNs. This is because the proposed action is not to decide how many aircraft carriers we should have in the Pacific Fleet; the action is to decide whether to construct the optimal facilities and infrastructure to support them. Since NEPA requires that an EIS evaluate a no-action alternative, we had to determine where to homeport three CVNs if no new facilities were constructed. Logic dictated that we would not move the CVNs currently homeported to North Island, Puget Sound Naval Shipyard and Naval Station Everett. The rest of the solution was to locate one additional CVN at the existing transient berth at North Island; locate one additional CVN at Puget Sound Naval Shipyard; and keep the AOEs at Puget Sound Naval Shipyard.

The Navy's preferred alternative is alternative two, which would homeport two additional CVNs

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at Naval Air Station North Island and maintain Naval Station Everett as a CVN home port. The Navy's preference for this home port combination is based on North Island's accessibility to the sea and the training ranges; Pearl Harbor Naval Shipyard's inaccessibility to the training ranges and its lack of facilities to support a carrier air wing; and the operational and quality of life advantages of the existing CVN home port at Naval Station Everett and the assumption that depot maintenance of that CVN can be successfully completed without a significant adverse impact on crew quality of life or maintenance schedules and costs.

Now I will describe some of the construction needed for maximum development at North Island to provide home port facilities for a total three CVNs. To achieve the necessary water depth of 50 feet, approximately 490,000 cubic yards of dredging would be required. The dredged material would be disposed of at a designated ocean disposal location approximately five miles southwest of North Island or at another location in accordance with permit conditions.

The existing pier J/K would be demolished and reconstructed to provide required CVN berthing. The demolition and reconstruction of pier J/K is required to maintain Berth L as a transient CVN berth to support air wing training and battle group training for CVNs in the U.S. Pacific Fleet area of responsibility.

Approximately 1.2 to two-and-a-half acres of

dike area would be filled behind the pier. The fill material would be covered with a concrete cap to provide a transitional paved area to the other CVN berth facilities. Filling in the acre dike area would require establishment of a mitigation site to address the loss of shallow waters and eelgrass habitat. The mitigation site would include the creation of new bay bottom and establishment of eelgrass beds with new enhanced intertidal and subtidal habitat. The mitigation site would be constructed adjacent to Pier B at the western end of North Island. Approximately 50,000 cubic yards of sediment would be dredged to construct the mitigation site and would be in accordance with permit specifications and agency requirements.

The concrete wharf would be supported by concrete and steel piles, reinforced concrete, pile capbeams, and the deck slab. The wharf would provide steam, low-pressure compressed air, potable water, pure water, salt water, sanitary sewer, oily wastes, jet fuel, and marine diesel fuel. Electrical utilities would include a new 4,160 volt substation.

Additional improvements would include relocation of the existing ferry/flag landing that accommodates personal transportation across San Diego Bay. Other improvements would include a CVN warehouse, a fleet support building, equipment laydown building, and lighting. Improvements to the security fence and a security fence would also be needed.

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The Draft EIS analyzes the potential environmental effects of the six alternatives. The analysis specifically addresses construction and operation of associated facilities and any dredging that may be required. The study also covers significant issues identified during the public scoping process. The environmental issues that are addressed in the draft EIS include the 17 issues on this slide. I'll let you read through them now and just point out the transportation area includes traffic.

The EIS identifies potentially significant environmental impacts at some or all the home port locations for the following issues: Marine biology, ground transportation, general services, and utilities. The chart summarizes the potentially significant impacts at each CVN home port location.

At Naval Air Station North Island, dredging and pier replacement, which would cause marine habitat and eelgrass habitat removal, would have significant but mitigable impacts on marine biology. These impacts would be associated with alternatives one, two, three and four and would be mitigated by construction of a habitat mitigation area.

At Puget Sound Naval Shipyard significant but mitigable impacts on marine biology could result from dredging and marine construction during the salmon outmigration season and from construction of a confined disposal facility, if needed. These impacts would be

associated with all five of the action alternatives. Impacts on salmon migration could be mitigated by avoiding dredging and marine construction from mid-March to mid-June. Impacts from construction of a confined disposal facility, if needed, potentially could be compensated by construction of a shallow-water habitat. Also, significant unavoidable impacts on general services and utilities would be associated with the no action alternative at Puget Sound Naval Shipyard.

At Naval Station Everett significant but mitigable impacts on marine biology could result from dredging and marine construction during the salmon outmigration season and during the Dungeness crab molting period. These impacts would be associated with alternatives one, four and five and could be mitigated by avoiding dredging and reconstruction from mid-March through mid-June. Under alternative four with CVNs at Everett, increased local commuters would cause a significant but mitigable ground transportation impact. The impact could be mitigated by providing roadway improvements and by implementation of a trip reduction program.

At Pearl Harbor Shipyard significant but mitigable impacts on ground transportation would occur with the homeporting of a CVN. This impact would be associated with alternatives three and five and could be mitigated by providing roadway improvements and by implementation of a trip reduction program.

Now I'd like to introduce Mr. Tom Beckett who will discuss the Navy Nuclear Propulsion Program.

MR. TOM BECKETT: Thank you, Captain.

Wow, good turnout tonight. Certainly validated the request for a separate meeting in downtown San Diego. If you don't tell the Fire Marshal I won't.

You have probably seen it on CNN. Aircraft carriers give the president four-and-a-half acres of sovereign territory he can count on, any time he needs it anywhere in the world. Fleet commanders agree, nuclear power enhances the capability of an aircraft carrier. With tactical flexibility, high speed endurance, and mobility the nuclear powered aircraft carriers can respond to crisis more quickly, arrive on station and higher state of readiness and remain on station longer with less logistic support than their civilian -- excuse me -- than their fossil fueled counterparts.

Before discussing the results of the radiological analyses contained in the Environmental Impact Statement, I'd like to provide some background on the Navy's nuclear propulsion program. Earlier this year we celebrated our golden anniversary. You may have seen on the table outside copies of the brochure documenting some of the many kind words we received to mark this occasion from the nation's leaders. If you haven't done so please take one at the break time.

In the past 50 years the Navy has logged over

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5,000 reactor years and 115 billion miles steamed on nuclear power worldwide safely. There has never been a reactor accident nor any release of radioactivity associated with our program that has had a significant effect on the public or the environment.

The Navy nuclear propulsion standards and record surpass those of any other national or international nuclear program. To validate compliance with our strict radiological control requirements we conduct extensive monitoring of the environment in areas where we operate, including San Diego. Monitoring includes analysis of water, sediment, air, and marine samples for evidence of radioactivity. Reports on the results of this monitoring are published openly and annually and have been done so since the mid-1960s.

We refer to the Blue Book obviously because of the color of its cover. The Blue Book is available in the Coronado library for those of you who are interested.

There have been as many as 22 reactor plants associated with nuclear powered war ships which have been homeported in the San Diego area over the past 40 years. Independent surveys which have been conducted by the Environmental Protection Agency and by other government agencies confirm the results of the Navy's own annual environmental monitoring program. Operations in San Diego over that period of time have had no significant affect on the environment.

Now, that doesn't mean that we don't

occasionally release radioactivity, but what it does mean is that reactor plant operations which release radioactivity are infrequent and result in small releases which have no significant affect on the environment.

Naval reactors are different from and much more robust than their civilian counterparts. The background on this slide shows U.S.S. THEODORE ROOSEVELT undergoing live fire shock testing in 1987. The plume of water behind the ship represents the detonation of the equivalent of over 50,000 pounds of T.N.T. close to the hull. Don't try this in the home reactor pad.

The propulsion plant passed with flying colors allowing the ship to continue operating. This is no surprise. Unlike civilian plants, naval reactor plants must be designed to meet the rigors of combat. In addition, naval reactor plants must be designed to fit within the constrained volume of a war ship hull. Even on a ship as large as a nuclear powered aircraft carrier, as many as 6,000 sailors work and live every day while deployed within 600 feet of two operating reactor plants.

These design requirements result in reactor plants which are exceptionally resilient and rugged. In addition, the reactors are simple and small. Typically less than one-fifth the size of a civilian nuclear power plant. The naval reactor designs have features which enhance peacetime protection of the public in the environment under the benign conditions existing in any near port when the reactors are being operated at very low

power or shut down.

Emergency preparedness is a normal part of ongoing Navy planning and training. Emergency preparedness covers a wide range of situations from events such as fires, to less frequent situations. Navy plants cover a wide range of situations from common events such as fires to less frequent events such as severe weather, highly unlikely events such as radiological emergencies. Radiological emergency preparedness starts with continuous monitoring of radiological work by trained crews who are highly motivated to detect any abnormal condition. It includes detailed procedures which are thought out in advance and tested to deal with the abnormal situation. Because of the conservative design approach used in naval reactive plants and their facilities, the impacts from radiological emergencies would be localized. Consequently, emergency plans are based on using Navy resources to combat the problem. The plans do include prompt notification of state and local officials. Let me reiterate that. Plans do include prompt notification of state and local officials. Existing state and local government plans for ensuring public safety during general emergencies such as severe weather are sufficient to deal with the situation if necessary.

With that background and experience let's discuss the Environmental Impact Statement radiological analysis. We performed detailed analyses which looked at potential impacts to air, water, and sediment quality from

normal operations and a range of potential accidents. We performed the detailed radiological analyses which looked at the potential impacts to air, water, and sediment quality. Analyses cover impacts to humans as well as to plant and animal life. The analyses were conducted using internationally accepted methodology and use International Commission On Radiation Protection risk factors. These risk factors assume that a given radiation exposure to a member of the public results in higher risk than it would to a facility worker or sailor. This accounts for more sensitive populations among the public such as children in and the elderly. Fatal cancers are reported since fatal cancer is the commonly accepted measure of impact from radiation exposure. However, the analyses also cover non-fatal cancers and other health effects including genetic effects.

We used several conservative assumptions to determine risks from both normal operations and from hypothetical accidents. For example, we assumed that weather conditions exist which would maximize exposure to the public from the radioactivity released. We also used radiological source terms which greatly overestimate the amount of radioactivity released. If these conservatisms were removed from the analyses, the risks would be many times lower than those reported, which I'm about to summarize.

For cumulative impact we assumed that all nuclear powered ships in the area are concentrated at the

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home port location. For North Island this means that as many as 12 reactor plants representing the ten submarines and one CVN currently in the area were evaluated for the baseline, and then up to 16 reactor plants representing the same 10 submarines and up to 3 aircraft carriers were evaluated for cumulative impacts.

Let me digress a little bit at this point and talk about potential shipboard accidents. The evaluation of shipboard accidents does reveal significant details about military capability and war ship design. Consequently they are contained in a classified appendix consistent with the requirements of NEPA. The classified appendix is not releasable to the public but has been provided to E.P.A. headquarters for review. What we can state publicly about the classified analysis is that all environmental impacts and conclusions from this classified appendix are covered by the discussion of facility accidents in the unclassified sections of the EIS.

In addition to the analyses in the Environmental Impact Statement we provided a comprehensive classified analysis of the design of the NIMITZ-class reactor plant to the Nuclear Regulatory Commission and its advisory committee on reactor safeguards. They conducted their own detailed analyses and agreed with our conclusions: These plants are safe. These reviews, although not required by law, are part of the Navy's longstanding commitment to obtain an independent consideration of important elements of reactor plant

design.

Here are the results of the radiological evaluations for homeporting nuclear powered aircraft carriers at North Island. They show the average additional annual risk of latent cancer fatality to any single member of the public within 50 miles of North Island are one in one billion from the cumulative impact of normal operations. For the most severe facility accident, the additional annual risk is one in seven hundred million. This slide is provided to show some perspective on the previous risk numbers. Notice I didn't say there is no risk associated with these operations, but our conclusion is that the risks are less, much less than the risks associated with everyday life.

Finally, this slide shows what I like to call a Seal Team environmental inspection of U.S.S. NEVADA in her home port. I use this slide to punctuate our conclusion that there are no significant radiological impacts from any of the homeporting alternatives.

I will now turn the program back over to Captain Deal.

CAPTAIN ROCKLAND DEAL: Now, normally at this point we take a ten-minute break, but I think due to constraints of the facilities we have here tonight we will probably best, unless I hear something different, and we will go to launch into the speaker part of it. If I can get some of the contact folks to bring the cards out that we have so

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far. We want to hear from you. We want to hear from as many people as we can. Hopefully everybody will get a chance to speak tonight. When you -- I'll announce -- I think because of the difficulty of getting down to the front of the room here, I will probably introduce three people or have three people ready to speak; and when you step up to the mic, please state your name for the Court Reporter here so we make sure we get comments back to you when we record your comments for writing. Also point out that oral or written comments, they will both get complete and thorough, as we can make it, reply in writing. So if you can't get everything said orally here, please put it in writing and we will answer that part. All right.

Okay. First to speak will be Victor Castillo followed by Ruth Heife followed by Laura Hunter.

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VICTOR CASTILLO: Good evening. Thank you for letting me speak here briefly tonight. (inaudible) regrets his inability to be here tonight, yet he attended last night's hearing and asked me to attend tonight. He submits for the record an article he wrote for the "San Diego Union Tribune," from September 2nd of this year, and the article is entitled "Public Needs Information About The Nuclear Carriers." We ask that it be respectfully submitted for the record. H.2.1

(Attached as Exhibit 1.)

Thank you.

LAURA HUNTER: Good evening. My name is Laura Hunter from the Environmental Health Coalition. I would like to take a moment to ask everybody in the audience tonight who is opposed to nuclear homeporting in San Diego Bay to please stand. H.2.2

We are asking the Navy -- I would like to ask you to remain standing just for two minutes while I make comments, then I'll ask you to sit down.

We are asking the Navy to take note, there is significant public concern and opposition to the nuclear megaport in San Diego Bay, and we demand that you take our concerns into account before you bury us with more nuclear reactors and even more risk to our health and our safety.

One point we want to make very, very clearly, telling us what you are going to do is not the same as including us in your decision. It is not the same as an inclusive decision-making process that we deserve and count on in a participatory democracy. We are here tonight to demand a real voice in this process. H.2.3

Thank you.

The speakers that follow me will raise issues that have been of concern in the past and are still of concern in this DEIS. Nothing has changed, nothing except we are going to have more reactors, more waste, more traffic, and more risk. The concerns we have raised in our previous extensive comments on this project, the health risks are still unanswered, and they have been ignored. The health risk assessments are still improperly H.2.4

manipulated. The Navy accident record is still hidden. H.2.4
Our safety is still unprotected. No meaningful actions
have been taken in response to the considered,
intelligent, thoughtful public input that has been
provided to you today. These are not the actions of
participatory democracy, and it makes a charade out of
this process.

Many of us have been involved in this project H.2.5
since 1994. We have attended seven public hearings on
five separate environmental documents on one project; the
nuclear megaport project. By splitting the impacts into
five separate studies, the total impact of this project
was hidden and obfuscated. This is piecemealing, and it's
not allowed under the law. Of these five reviews none has
been signed by a person who cared enough about us to come H.2.6
out here and hear from us first hands about our concerns,
about how this project will affect our lives.

Frankly, I have a lot of sympathy for you
gentlemen sitting there; you don't make the decision.
Where are the guys that are going to make the decisions
about our lives?

This is not the action of a government that H.2.7
exists for and cares about the good of the people.
Democracy is also undermined when the Navy completely
self-certifies and self-regulates the most dangerous
aspects of this project, and that's the nuclear propulsion
part. It violates the all important checks and balances
of power integral to our society.

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Bottom line, fifth piece of this puzzle H.2.8
ignores public input, and most important to communities.
It's most objectionable that this person who was
ultimately responsible for this, specifically Secretary of
the Navy, Richard Dansig is not here.

I urge everybody in attendance to call Dansig
and say where were you. We want to talk to you. Call and
dial for Democracy tomorrow. Anything less is
unacceptable.

Thank you.

MARILYN FIELD: Good evening. I'm Marilyn Field, H.2.9
and I live in Coronado, but I didn't go to the meeting in
Coronado last night. I'm here tonight because this is the
first meeting you have had in San Diego, and this is not
just a Coronado issue. This project affects San Diego and
surrounding communities equally with Coronado, and tonight
you are going to hear the names of many people from many
communities around San Diego who oppose this project.

And why are we all concerned? H.2.10

Homeporting three nuclear aircraft carriers
with the support facilities, the nuclear waste processing
plant, and the nuclear waste dump within less than a mile
of the center of a major population center makes no sense.
Especially when it's right between two earthquake faults
on loosely compacted landfill.

Why are we concerned? Put very simply, H.2.11
accidents happen. They happen to everyone. They happen

even in the nuclear Navy.

For five years now you have been telling us the Navy makes no mistakes; there are no accidents; never had a reactor accident in the history of naval nuclear propulsion, but that's because you define reactor accidents very narrowly. You have many things which you call incidents which general population would call accidents. I have a list of 11 of them, and six others that are near accidents.

And I will give this to the Court Reporter and she can put it in the record.

(Attached as Exhibit 2.)

Accidents are especially likely to happen when you have short-handed personnel and personnel are worked around the clock to compensate for vacancy. This has been much in the news lately. The Navy has told us how they are going to have to do something, either lower their recruiting standards by to the lowest categories or taking other actions, but right now you are not fully able to man your personnel slots, and that creates the risk of accidents and people get tired and overworked just as it did when you spilled mercury in the San Diego bay two years ago which cost about $2 million to clean up.

I first became very seriously concerned about this project when I read the EIS for the STENNIS because one of the things that concerned me was that I read about the Navy's accident plans, and that there is a warning system and Navy based personnel will be inside within five

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minutes and evacuated from the base within two hours. But there are no emergency evacuation plans or warning sirens or perimeter monitoring to let civilians know what is happening in the event of an accident.

For years now -- several years now -- we have been asking for at least perimeter monitoring, emergency warning, and emergency plans including evacuation plans. Civil plans for an earthquake are not sufficient. Emergency plans are not effective unless civilians know what they are and what they are supposed to do if they are warned. Right now we don't even have a warning system so we could tell people in the event of an accident. Perimeter monitoring is available; it is not that expensive; it is used in other -- around other nuclear facilities around the country, and there is even federal money available and it's encouraged. Citizen monitoring is encouraged by -- the Navy has tried to oppose this and has so far refused to provide this to us.

So I say it is time for the public to say no, and I think we are saying no tonight.

No more nuclear propulsion.

And it's time for the Navy to say yes. Yes to answering our questions, and yes to our reasonable requests for citizens' safety measures in connection with the carrier we already have here.

One more comment. I have spent a lot of time in the last few weeks trying to understand this document, and particularly the appendix dealing with radiation

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risks, and this document is a disgrace. You talk about it being conservatively calculated. It isn't. It is a highly biased Navy P.R. piece which does not take into event the latest scholarship and research done on low level radiation. Moreover, in your risk you multiply your -- whatever you decided is your risk of an accident, which I guess you think is pretty close to zero. That greatly underestimates the risk. Also risk is stated as average annual risk. Nobody cares if they are going to get cancer this year or next, they want to know if this is going to cause me cancer in my lifetime. H.2.16

What we need -- I have been to many meetings. I speak my peace. I have written letters. My comments are ignored. My questions aren't answered. I have been at this for three years now. We really deserve answers and we need a dialogue. We don't just need you to listen and hear us and ignore us. H.2.17

Thank you.

LUZ PALOMINO: (In Spanish. Not reported by the Court Reporter.) H.2.18

UNIDENTIFIED SPEAKER: I'm going to translate.

The additional impact of aircraft carriers, nuclear aircraft carriers and a waste plants here next to our streets. I don't understand why the documentation of this project wasn't in Spanish, nor do I understand why this is the first time you had a meeting in San Diego.

We are already victims of a lot of H.2.19

contamination in my neighborhood and emissions from a lot of industries that put out toxic waste. The fish in the bay already are contaminated, and they are not good enough to eat. H.2.19

One of the aspects of this document that wasn't analyzed recently also that we found out was that you have now contracted with three local ship builders to do your defense contracts. And the contracts guarantee that the nuclear ships will be repaired next to this site. That will bring even more contamination to my neighborhood. And that is a direct and indirect impact of these nuclear aircraft carriers that was never ever contemplated in your EIS or even talked to in the community. H.2.20

I live downwind from the project, from your project. And if there is an accident, my family, all of our families and all of San Diego are in jeopardy by these nuclear aircraft carriers. H.2.21

ERNIE McCRAE: And if you happen to have accidents that you say you haven't, all I can reply to that is thank goodness. You see, I have had personal experience with accidents that had happen. I was part of many families in San Diego that hosted kids from Belerusse that had a tremendous nuclear accident, or nuclear incident, and their lives have been changed forever. The reason they came here was to replenish their immune systems. The fruit in their country has been changed. The structure of H.2.22

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their very nature has been changed.

Let's say we don't have an accident anywhere near our lives. Some day it is going to happen. And then how is that explained to children. I'm here representing children because that's what my work -- life's work is all about. I happen to be Principal of Cabrillo Elementary in Point Loma, and we don't have a clue as to what to do if something happened to release nuclear waste, and we are very close to where you are; and we are upwind, downwind, sidewind. Every afternoon in Point Loma the winds are just all over the place, anybody who lives in that area.

I think we owe it to future generations -- I happen to have nine grandchildren who live in this community, and we owe it to them and their descendents to think of other ways to carry on our national security. I think that it's become like a game and someone had mentioned that there is no consideration of people who oppose, and the Secretary of the Navy should be here. This is extremely important, and I think it's a lack of respect for our community that they put you in this situation to take this on.

Thank you.

DEE CHRISTIAN: Good evening. I'm Dee Christian. I'm a retired physician from U.C.S.D. and the president of the board of the Peace Resource Center in San Diego.

As a physician at the same time as every month I get literature showing that tinier and tinier and

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tinier amounts of radiation are now proving to be medically devastating. The Navy is busily bringing in ship after ship, and submarine after submarine, nuclear repair facility after nuclear repair facility making San Diego already one of the sixth most largest cities in the United States, one of the most radioactively at risk cities in the United States.

To a physician this is starting to seem absolutely insane. We know that if one of these floating nuclear power plants goes wrong with no containment vessel, we are supposed to evacuate a ten-mile radius within five hours and get potassium-iodine and shelter to everyone 74 miles downwind way into Mexico, and we also know that no such thing will happen; and we are doomed. Even without accidents we are in trouble.

All these nuclear processes involve routine allowable legal exposures in this state of radionuclides. These small amounts are more health threatening than we have realized, and more health threatening than your risk assessment assumptions are making. We thought Chernobyl would hurt people 12 miles away. We now have 150 percent increase in breast cancers 25 miles away from Chernobyl. We have a thyroid cancer epidemic in Chernobyl from Chernobyl and that is hundreds of kilometers away. The Pilgrim Nuclear Plant studies prove the leukemia rates go up around plants emitting perfectly legal and routine amounts of radioactive material. The Oak Ridge National Laboratory and Portsmouth Naval Shipyard workers have

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excess lung cancers and leukemias with a tiny and extra dose, single rem which is one-third of what the Navy is permitted to administer to each of us without thinking about it.

Of grave importance to San Diegans faced with living near dozens of low radiation emitting plants and naval facilities, the Oak Ridge data show that low doses of radioactivity delivered slowly over decades are ten times more likely to make a human cancer than are high doses of radiation delivered quickly.

One-third of those who work at Rocketdyne in Simi Valley receiving only doses way under those considered safe by current law and used in your risk assessment numbers died of cancer. That's eight times the number that should be dying of cancer.

There is already radioactivity alpha and beta emissions in our bay's fish, and although it is natural to fear an accident with massive uncontrolled releases, the medical literature is starting to warn that it's really the slow environmental accumulation from each one of dozens of allowable naval point sources during routine operations, repairs, transportation, and storage that's going to do us in. Once out in plants, fish or humans, these molecules do damage for up to thousands of years, and they are not recoupable or made less dangerous over time. In fact, having chlorine or chlorination in our drinking water makes some of them more apt to stick into the body and cause cancer. What an ironic twist of

biology that is.

From a physician's point of view, basing the nuclear Navy and its dangerous onshore support facilities in a large population center like San Diego defies reason and comes with unacceptable health and environmental risks.

CAROL JOHKAW: I'm Carol Jonkaw. I'm the executive director of Peace Resource Center.

One of the things that I would like to address tonight are the claims made here and elsewhere by the Navy that an all nuclear carrier force is necessary because it provides a military advantage.

In truth a new report released by the general accounting office this August revealed that nuclear powered carriers offer no discernible military advantages over conventionally powered carriers and concluded that they are far more expensive to operate and maintain. I recommend this is some good reading. It is a little more easier user friendly reading for folks than the EIS. Good reading.

I'd like to say to you that what needs to happen is the Navy has got to stop perpetuating myths about the superiority of nuclear carriers and start talking about some real facts.

Fact: As revealed in the G.A.O. report, nuclear carriers are far more expensive to operate and maintain costing over $8 billion over a 50-year life span

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each. That's 58 percent more than a conventional carrier cost to operate over 50 years, and these costs do not include the cost of decommissioning nor the cost of storage of the reactors, spent nuclear fuel for thousands of years. H.2.29

Fact: The Navy stopped building other nuclear powered service vessels after 1975 because of the high cost. H.2.30

Fact: Remaining nuclear powered surface vessels have been decommissioned early because they were not cost effective to operate and maintain. H.2.31

Fact: Conventional and nuclear carriers both have been effective in meeting requirements of our military strategy requirements. They share many of the same characteristics and capabilities and are employed interchangeably. H.2.32

Fact: A carrier force of 12 conventional carrier groups, battle groups, actually can provide a greater level of overseas presence at a far cheaper cost than a nuclear carrier force. H.2.33

And a fact to put some of this into real perspective, some of these claims, do they get there faster? Sure, a little bit. As a G.A.O. report points out, on a trip from the east coast to Mediterranean, the nuclear carrier will get there two hours sooner. Six hours sooner from the Pacific to the Persian Gulf. H.2.34

Now, I want to ask you is two hours or six hours worth the cost? Is it worth putting the health and H.2.35

risk, health and safety of our communities at risk from radiation exposure to save a few hours? H.2.35

THE AUDIENCE: No.

CAROL JONKAW: There is really no sane, rational reason to develop nuclear carriers. Nevertheless, San Diego is faced with becoming the largest West Coast concentration of nuclear carriers in the U.S. People here might be interested to know that on September 25th less than one month, less than one month after this report came out the Department of Defense approved the Navy's request that the next generation of carriers, the CVXs be outfitted with nuclear propulsion plants. H.2.36

This is not a surprising decision given the Navy predictions, nuclear propulsion and the influences of the nuclear industry, but one has to really question the continued loss of democracy that is demonstrated when a decision such as this which impacts the health and welfare of so many people is once again with the public knowing very little if anything about it and certainly not being included in the decision making process.

Let's get very clear about this. Nuclear carriers do not add to our security. In fact, they make us less secure. They make us less secure by stealing money away from needed social programs that would enhance our quality of life and by increasing the health and safety dangers to our community. H.2.37

Your Draft Environmental Impact Statement has a lot of serious flaws, but the most fundamental one is

the assumption that nuclear carriers are necessary. You don't really need them, and we certainly don't want them. H.2.37

PAULA FORTERS: Good evening. My name is Paula Forters, and I am staff counsel for the Environmental Health Coalition. In these public hearings tonight and last night you have heard concerns of many members of public. You are going to keep hearing those concerns tonight. You also heard form elected officials, technical experts, and they are all telling you about the problems that we have with this project. H.2.38

I want to talk a little bit about the legal problems that exist with the EIS in order to build on some of their concerns.

First, the Environmental Impact Statement analyzes the impacts of this project by using the assumption that two CVNs will replace two CVs that will be leaving San Diego. This just serves to minimize the appearance of impact on this project. In fact, San Diego is currently a home port to only one CV. It has not been a home port to more than two CVs since the U.S.S. RANGER was decommissioned in 1993. Thus in reality only one CV will be leaving San Diego, not two as the EIS claims.

In contrast with what the Navy has done, the law requires that the Navy analyze this project compared to what is on the ground now, and the potential impacts from this project must be analyzed compared to what exists now. If this analysis is done according to law, the real

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impacts from this project will start to show up. H.2.38

Second, as the Navy is well aware, the EIS must consider all of the potential health impacts to the people of this region, and yet there are several gaping holes in this analysis. H.2.39

You have heard from some of the folks as to problems of the analysis of the radiation impacts. I want to talk about are for a second about problems of the analysis of the toxic air contaminants that are going to be released as a part of this project.

The EIS fails entirely to analyze the impacts from potential increases and emissions of toxic air contaminants at NASNI. Now, realize that NASNI already ranks second in San Diego County for posing the highest industrial cancer risk to surrounding neighborhoods. It is second only to the Point Loma Naval complex. This is already a huge burden on the people of this region and yet the increases in cancer causing emissions from the added burden of two more carriers has not been established, and the added burden of servicing those carriers. That has not even been mentioned in this EIS.

In order for the EIS to give full information to the public about the existing environment at NASNI and the potential impacts of this project, all existing emissions of both toxic criteria pollutants from all NASNI operations must be documented and all future emissions of both toxic and criteria pollutants from this project must be documented.

Additionally, the potential impacts from the air wing which is attached to those carriers hasn't even been addressed. The EIS cites the close proximity of the multiple airfields to this project is being necessary for this project and yet does not even mention the potential from impacts from the air wing that's associated with those fields. It would lead us to believe that those fields would not even be used, even though they are necessary for this project. H.2.40

In sum, the current analysis is flawed and legally insufficient. Does not rise to the standards of a National Environmental Policy Act, and that act was developed and passed so that people like this could have full information about government actions before they were taken. H.2.41

You haven't done that. You haven't complied with the law, and we are calling on you to do just that, to provide complete information about this project to the public and finally come clean.

Thank you.

JENNIFER DUMAS: I'm here representing the Peace Resource Center and the Environmental Health Coalition, and I support all the statements that have been made by those representatives; and I'm here to read the names of people who couldn't be here today but who also support those statements. From east county: H.2.42

(Written list of names with proper spellings not provided to the Court Reporter.)

(Written list of names with proper spellings not provided to the Court Reporter.) H.2.42

BETTY HIMLY: I'm Betty Himley. I am a volunteer with the Peace Resource Center, and I would like to read the names of the people from Pacific Beach who could not be here and support our efforts to be heard. H.2.43

(Written list of names with proper spellings not provided to the Court Reporter.)

JASON FLORES: Good evening. My name is Jason Flores. I am a resident of Pacific Beach, and I would like to voice my support for the earlier testimony of the Environmental Health Coalition and the Peace Resource Center. H.2.44

The following are the names of people I collected in the Ocean Beach vicinity who are also opposed to nuclear homeporting:

(Written list of names with proper spellings not provided to the Court Reporter.)

Thank you.

ALAN McAFEE: I'm Alan McAfee speaking in support of the Peace Resource Center and the Environmental Health Coalition and other people also wish to have their names entered in support of those groups: H.2.45

(Written list of names with proper spellings not provided to the Court Reporter.)

Thank you.

JOE VARLEY: Good evening. My name is Joe Varley. H.2.46
I'm a native San Diegan. I was raised in Rosecrans Street just near the subbase in San Diego near the (inaudible) Point subbase. I lived there when it was an atomic submarine base.

My wife and I now live next to the Sparwars facility on Point Loma. The reason I mention this is I want to establish that I know what kind of neighbor the United States Navy can be. The Navy has always been responsive to the community needs. The Navy brings the best and the brightest people to our city. The future citizens and leaders of this city will have a heavy representation of former Navy personnel. The Navy also brings with it the cutting edge of technology.

The world leader of nuclear technology is the United States of America. And the leader of that technology of ship powered nuclear propulsion is the United States Navy. No one in the world is better prepared to use nuclear power than the United States Navy.

The Navy has always in the past accepted its responsibility to mitigate the impacts to traffic congestion, education, and the environment. There is no reason to believe that their dedication will change any time soon.

To those concerned with the possibility of a nuclear disaster, I would remind you that more people died at Chappaquidic Creek than died at Three-Mile Island.

I would urge everyone to support the H.2.46
homeporting of these ships. It's good for the Navy and it's good for our city.

Thank you very much.

STEVE McWILLIAMS: My name is Steve Mc Williams. H.2.47
I'm currently on trial for providing marijuana medicine to patients in San Diego. I find it absolutely offensive that our government spends billions of dollars to provide death to people all around the world, while at the same time prosecuting our own citizens right here in the United States, simply for trying to take care of themselves.

I am offended that indigenous people, native Americans, mainly in South Dakota and other parts of the United States are digging up uranium ore and making plutonium in highly dangerous situations, and all of that has to come here; and as it travels here it is incapable of endangering many people as it is being transported.

After all the Navy has done with it, the H.2.48
waste products have to be disposed of, and we haven't even figured all of that out either.

All of this is meant to just provide death H.2.49
and destruction for people around the world. All these ships can do is rain terror and death on people, and I am offended by that. I'm offended by a government that has nothing better to do than to hurt other people while leaving its own people homeless and desperate and bedridden and diseased and illiterate and poverty

stricken. I'm offended by this government. And you represent that. And so you offend me too. H.2.49

MILES HARVEY: I represent the Landing Homeowner's Association which is the homeowner's association for the 92-unit condominium complex at 1st and Orange Avenue in Coronado. H.2.50

For many years we have been interested in the traffic problem, and because of this DEIS we have reviewed it in some detail; and we have the following comments on the DEIS itself: We are embarrassed to say that we believe that it is fundamentally and fatally flawed and that the information in the DEIS does not speak as of the date of its issuance and the facts relied upon do not exist today.

Throughout the DEIS refers to the quote, current situation, close quote, as being two CVs homeported at the air station and throughout gives credit to the removal of two CVs. This simply is not the case. As the only major ships homeported at the air station are one CV CONSTELLATION and one CVN the newly arrived STENNIS. The references to removal two CVs, see pages ES-8, 9, 17, 19, pages 2-44, 2-49 and the, quote, status quo, close quote, described on page 2-44.

It also stated that beginning in 1998 three aircraft carriers will be homeported at the air station. Again, this is at page 2-8 and 9. This is not true. Has not been true, and will not be true. There is no way a

H.2

reasonable person can analyze the volume of information by simply subtracting out one CV to make it true. It's very, very difficult. H.2.50

The EIS also states, quote, The Navy is currently in the process of redesigning the main gate so that the entrance will be aligned with 3rd Street at Alameda Boulevard and the exit aligned with 4th Street, close quote, pages 3.9-4 and 3.18-11. The implication is that the gate will be realigned and this will mitigate traffic problems. This, however, does not comport with the recent statement of Coronado's Mayor Smisek that due to the cause of the realignment and SANDAQ's lack of funding, such realignment is, quote, dead, close quote. H.2.51

So many of the facts and figures used in the DEIS are outdated and should be updated to the current situation. That is downsizing one CV, one CVN, current terrorists threats by increased security at the air station, et cetera. H.2.52

Traffic trip rates based on a mid-1980 study at May Port Naval Station in Florida would be laughable if they were not contained in a serious DEIS, page 3.9-5. Quote, daily traffic volumes, close quote, were collected from Caltrans, the City of Coronado, and the Navy in 1995, close quote. Page 3.9-5. There must be information that is less than three years old that reflects the different population and ship mix at the air station at the present time. H.2.53

We also now have experience with delays in

traffic caused by threat alert condition. We also have the suicides, the accidents on the bridge that completely snarl up the access to Coronado Island. H.2.53

Unfortunately by trying to justify conclusion there are what we believe to be substantial emissions of two vital mitigation measures. There is no mention of the realignment of the main gate as a mitigation measure, although the DEIS seems to erroneously assume that it will happen. There is no mention in the proposed bore tunnel although it is on the Coronado Municipal ballot this week -- or next week. H.2.54

Last but not least we believe that there must be discussion probably under health and safety that the increased threat of terrorist activity for strategic targeting by foreign powers caused by accumulation of three and four if transient dock is used of the world's largest war ships in a very confined space. This must have an impact on the desirability of gaining maximum results from illegal acts. This really needs to be treated in the DEIS. If it is to, quote, evaluate potential impacts, close quote, from the proposed homeporting of three nuclear carriers of transient dock of visiting nuclear carrier. H.2.55

Because of the factual foundation of the DEIS, it does not fulfill its purpose of evaluating, quote, the environmental effects from constructing and operating facilities and infrastructure needed to support three NIMITZ-class carriers, close quote, and requirement H.2.56

of informing, quote, of reasonable alternatives to avoid or minimize adverse impacts, close quote. H.2.56

It is interesting to note the DEIS, quote, acknowledges that the air station cannot support three additional CVNs for a total of four. That's page 2-69.

We respectfully request that the DEIS be rewritten in the present factual situation using current information and providing data on mitigation measures.

There is also a new noise study that has come out this week that certainly could be included. H.2.57

This is one of the most important matters facing the city of Coronado. Unfortunately although the law requires the Navy to prepare a supplemental EA or EIS should new information relevant to the environmental concerns bear on the impacts of the proposed action become available, the Navy really should go back to the drafting board and prepare a new DEIS to avoid the confusion that it would entail if they merely issued a supplement to the current draft. H.2.58

Thank you.

ED KIMERUP: Thank you. May name is Ed Kimerup. I am speaking here on behalf of the Sierra Club. Excuse my voice. I'm getting over the flu. The DEIS really really has a lot of flaws in it, and I think it's seriously flawed; and I would like to point out several instances here where we are submitting comments that will outline many of these. H.2.59

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One comment here that reflects the comment that is made about the traffic. They mentioned that there is a six-month maintenance cycle every two years. When you have three carriers that means there is an 18-month cycle that these 450 specialists have to come down to do the servicing, and yet in the EIS it treats it as if there is only a temporary crew here, like six months out of two years. And that's carried throughout the EIS. H.2.60

It doesn't recognize the traffic impact and the 450 people that will be coming. In the DEIS the air quality impacts of a commuting traffic because of this additional crew is not considered. Furthermore, it assumes that the traffic car emissions are based on the California standards when, in fact, many cars that are used for commuting are licensed out of state and states which have less strict air quality standards. H.2.61

There is also failure in the DEIS to mention a fire aboard the carrier. Nor is there any discussion of fire boats that could handle the situation. This is covered under the utilities and services section. H.2.62

The impacts on the bay water quality have been glossed over. For example, there is no discussion on the storm water runoff or from the carriers itself or the water runoff during maintenance where you are scrubbing painting and so forth. H.2.63

There is also a call that we had made for an independent committee with security clearance to overview the nuclear propulsion program. The E.P.A. may be part of H.2.64

that, but we have asked for a special committee to do that, and that was ignored. H.2.64

The radiological risk assessment that may be heard previously is seriously at fault. We don't believe that the elderly were included contrary to the comment that was made by the speaker. It only included the children. And I checked that this afternoon. And furthermore, if you look at the SANDAG studies, they show the demographics from all the cities surrounding these impacted areas and many of them have populations that have higher rates of elderly, Coronado, for example. You go across the bay to National City, the children, the ages there are much higher, and so that has to be factored in when you do a radiological test. But that hasn't been done and, furthermore, by averaging these numbers you do not give a true picture of the statistics; for example, we don't know what the maximum risk might be or what even the standard deviation of what that risk is, only the averages were taken. Two-and-a-half million people and you divide that into the risk, you are going to get a small number no matter what you think. But that isn't really giving you a realistic assessment of the people who are really to be factored. H.2.65

And that's -- those are my concluding comments. Like I said we will be submitting additional written comments. H.2.66

Thank you.

JANICE JORDAN: Hello my name is Janice Jordan. I'm a Peace and Freedom candidate for the 49th Congressional District, and I know a lot about democracy or lack of, I should say, in this country. And I saw a lot of lack of Democracy in your representation and your presentation here tonight, and I'm disappointed in you greatly; and hopefully as an elected official after November 3rd my words will be the words of the community, not only the community that's in here tonight but the community of the thousands of people in their homes and on the streets tonight where they are saying no more nuclear aircraft carriers.

I worked for the County of San Diego ten years ago. And one of the jokes that used to go around the office was that we had the cleanest bay in the nation because so many chemicals have been spilled in there that it killed off everything. Instead of pouring bleach into the water of the basin of your sink. And I remember taking a call that the Navy had dumped some paint on the rocks out on Coronado, and they were never held responsible for that because we could not site you for that because you were a government agency above us.

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If we can't hold you responsible for something as simple as spilling paint, how are we to hold you responsible for a nuclear disaster?

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I have been a long time community activist and a long time member, and as a community you are part of our community too; and I want us to work together, but

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that means you need to listen to us and be a part of us. We can't work against each other. My concern is your concern. I care about what happens to the Navy if anything should ever go wrong. You are a human too. We need to work together. You can't ignore us. Work with us. We are your community.

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WILLIAN E. CLAYCO: I'm William Clayco. I'm speaking on behalf of Save Our Bay, Inc., Imperial Beach.

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Usually we put comments in writing, but we don't expect any consideration of our comments, so we are going to save some paper. We have been conned for just about -- I have been conned for 53 years now. When somebody conned Harry Truman into dropping bombs on Nagasaki and Hiroshima I thought he had saved my life because I was slated to go hit the beach with the marines, and he saved me because he dropped those bombs. But then a found out years ago, I found out that he didn't have to drop those bombs because we had bombed Japan so badly, and we could keep it up for a few more months; and they were already at the consistency of watery jelly. The war would have been over in six months without the bombs. So somebody conned Harry, and he dropped the bombs.

Then the next president, good old Ike, he was conned too. He was conned into using nuclear power, the peaceful atom. And the con keeps going on.

But I like to know -- the last time I heard, one atom of plutonium in your lungs would give you lung

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cancer. One atom. So I would like to know how many atoms of plutonium are produced each day by each of your reactors. H.2.71

Finally, Germany has just decided to quit using nuclear power. And I think it's time our Navy did the same. H.2.72

WILLIAM HARRIS: I'm the founder of the Health Optimizing Institute. H.2.73

I can't really -- I can't believe this is happening. It's just like I think I'm going to wake up this is a bad dream. I can't imagine at this point in time that the Department of the Defense and Navy would be presenting such a situation in San Diego. I mean, we were looking at, you know, a campaign to create San Diego being a model optimal health community, and the real issue is, you know, it was the Department of War and the Department of War I think is all over, and they changed it to Department of Defense. Okay. So we look at what it takes in military for logistics, over 80 percent of the military is logistics, and so this money could be -- I mean, the conversation at this time -- I mean, the wisdom and the intelligence here, I mean, it's incredible; but I think we must be being run by the system. Is that the problem? Because, I mean, the wisdom and the integrity of the people here, all of us, I mean it's so incredible, I would expect that the conversation here would be about a conversion of creating a new job for the industrial

military complex, raising the pay, because you would be able to raise the pay, because what you are doing, the discussion would be how to use this money to take the warhead off, you would have the warhead ready, and put the peace head on which is creating war in reverse. H.2.73

My goodness, the need is there in the world. We got the money. We got the wisdom. We got the technology. And I can't believe that this is happening. I mean, this is totally unreal.

RANDY BERGMAN: Randy Bergman representing River Valley Preservation Project. H.2.74

My first comment is a repeat of the report, the G.A.O. report about no discernible military advantages over non-nuclear carriers and that Navy commanders don't request nuclear rather than conventional carriers for battle situations. Doesn't that say it all?

Certainly the independent G.A.O. report is more incredible than the nuclear Navy with its vested interest. Furthermore, each carrier costing 8 billion more to build and operate than a conventional carrier. This is a ludicrous waste of our tax dollars and should be widely reported on national evening news segments describing boondoggling.

Congressman Bob Filner in response to the G.A.O. report agreed that we can avoid the massive costs of public safety risks of nuclear carriers by simply building conventional carriers instead. I have asked the H.2.75

congressman to introduce legislation which would stop all funding of nuclear carriers. I hope everyone here will do likewise. H.2.75

I also plan to write the President to ask him to veto any bills which would fund nuclear carriers. As San Diegans we need to take the lead in making people throughout the country aware of such fiscal insanity. It is projects like these that have led us into a 6 trillion federal deficit. Congressional investigators are looking into these matters, and I understand that they should also include in-depth (inaudible) with profiting from such instruction and to see if such profiting is legal.

With billions of dollars at stake, it should be not surprising to find massive under-the-table-payoffs.

The Navy representative was quoted as saying that each time we drive a car over here we are at more risk of an accident than with a nuclear accident from these carriers. Yet it also -- this argument presumes that there would be no sabotage as others have pointed out. And the argument also misses the point, if anyone is in an auto accident, it does not have regional consequences. For thousands of lives both now and for hundreds of years to follow this technology is potentially so deadly on a massive scale it should be illegal. H.2.76

In sum as a resident of San Diego and taxpayer I strongly object to the Navy taking further risks with our health and life when far cheaper options are readily available. The purpose of the EIS is to H.2.77

protect the public from ridiculous projects. We can only hope that with increasing public awareness and pressure on Congress and the President this proposal will melt down. H.2.77

ALLISON ROTH: My name is Allison Roth. I'm a Southern California coordinator for Environmental Non-Profit known as Biological Diversity. I'm here on behalf of the southwest center tonight, and also to reiterate the comments that were raised by the Audobon last night, and I'm representing Audubon as well tonight. H.2.78

Our primary concern is that mitigation for the previous nuclear powered aircraft carrier resulted in a reduction of intertidal habitat. The mitigation -- eelgrass was required to be mitigated. It was mitigated in North Island, and the shoreline was pulled back, and the water was deepened. As a result, while eelgrass did well, the intertidal habitat was lost.

The intertidal habitat is for shore birds and fish. There is an amazing amount of -- there is an amazing reduction in their foraging habitat as a result of their mitigation. This is the exact same mitigation that is being proposed in the current EIS.

Fine (inaudible) are also impacted to loss of intertidal habitat. They are the critters that keep our water clean. And what we are afraid of is that there is only a few hundred yards of natural shoreline habitat left in North Island. And so while the proposed mitigation site may not look to be a significant amount, it is

significant cumulatively.

The EIS addresses upland and marine habitats, but it doesn't even mention the value of the intertidal habitat or mention intertidal habitat at all.

So we are very concerned that the cumulative impacts of this loss of interest tidal habitat as well as the project specific impacts which would result from eelgrass mitigation being proposed be addressed in the EIS. It is required by the Clean Water Act. It's not addressed, and it would be an inadequate Environmental Impact Statement. And I think that that sums it up.

Thank you.

H.2.78

ROSA LOPEZ ANGELES: (In Spanish. Not reported by the Court Reporter. List of names and correct spellings not provided to the Court Reporter.)

H.2.79

EDWARD SIEGEL: I'd like to make a few comments. I was planning to give something more definitive tonight. But seeing no overhead projector again, I guess the Navy feels anything we have to say doesn't deserve an overhead projector.

You gentlemen know why the Nazis lost World War II? Let me say previously to that. I'm Jewish. I think we need more carriers. Not here. Our biggest danger of people who are wanting to meet our ally. They are waiting for a nuclear attack. They want it. That's part of their mission in life.

H.2.80

Why did the Nazis lose World War II? They believed their thing, own propaganda would conquer the Soviet Union in three months. They marched in Russia with leather soles and nails in their boots. I'm a Russian Jew. So I'm (inaudible). Real cold. We invaded Russia (inaudible).

Okay. I notice you gentlemen -- I hate to be sarcastic, but I'm going to have to be sarcastic. I had a substantiative thing prepared, but it ain't going to happen.

You are very well dressed. Have any of you ever been in a reactor? Have you ever crawled around in one? I doubt it, especially you. You folks seem like public relations folks and you are doing your job. Unfortunately, you are not the people the citizens want speak to. They want to speak to experts from the Navy, and no offense, higher level people.

Let me say something unrelated to metallurgy. When you fly from here to Asia or you fly from New York to Europe, what direction are you headed? You go north, northwest, northwest. That means carriers in Bremerton, Washington are much closer to Soviet Union and China everywhere except maybe Figi, Tonga and South America.

Carriers 1500 miles south of here are in Norfolk versus up north on Eastern U.S. coast are much further from anywhere but the Mediterranean. There is a large equator. It takes 15 hours to fly from Jakarta, Tokyo. It is a very big player in our travel (inaudible).

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You want to go north to Nova, that's the way missiles go. There is no need for carriers to be 1500 miles south of Bremerton. It is called the great circle route. Okay.

This looks like a nuclear fuel. It looks like a zirc alloy two or zirc alloy four. It happens to be a Saporo beer can, and I bring it to show that if I didn't show you the beer can, you folks might think it's radioactive fuel element. I would like to meet people in a closed hearing of this nature with congressmen present and senators who know something technical about nuclear reactors. Okay.

And not to insult Mr. Beckett, I'm sure he is doing his job. But we are experts in nuclear reactors all of us. You are obviously very good looking, very well dressed. You are in public relations. It is word for word what we heard last night.

I would like to meet some experts. Getting near the end, what I want mentioned is purposeful fraud against the Navy by especially Westinghouse. Also General Electric, also Lockheed Martin, I've got cartons of documents, some of them 40 years old. Purposeful fraud. I hope it is to the point that they are very large false claims act suit.

Paper I published which I will be providing you gentlemen with some evidence to show you the profiting of whomever, probably not the Navy. The general magnetism against materials (inaudible) 347 1978 has been deleted from all U.S. international data bases except for this.

It is gone from the D.O.E. People can't believe it. It has been ripped out of many library books. It has been ripped out of the journal and the pages have been renumbered. If you look for a magnifying glass you can find it.

Mention two last things. I mentioned the other night this business about the EMERAUD the French nuclear submarine. I would like to meet anyone in the nuclear U.S. Navy who knows about this. This is an INCO-182 steam explosion.

Lastly, something very amusing to sort of close, next to lastly. Interesting article, I'll give you the reference and I'll have it in what I submit. San Diego Tribune, Wednesday, February 4th, 1998. Last night I talked about some very metallurgic detailed obscurities. There is a much more dangerous ship than any of your carriers that seems to have sank because of embrittlement welds and bolts. This is the TITANIC. Very interesting article. The ice didn't crush the plates. It ripped the welds open. The reason is they used, according to this, this is still being analyzed -- they used rivets and welds with much higher brittle impurities. I think at the time accidents were 2 and 3 percent, and 18 percent is the one they analyzed the one they brought up from the TITANIC. Very similar to what happens to reactors.

Last I would like to close with something very practical. I noticed a total lack of security. You folks may think you have a secure base out there. You

don't. There is a bunch of crazies around the world that pray to different Gods than you and I who would love to attack your submarines and carriers here. My suggestion is if you port these in Coronado, don't depend on your M.P.s and your marines. Hire yourself (inaudible) 50 or 100 retired Israeli intelligence guys, who smell an Arab a mile away and want to show pictures relatives (inaudible) 20 or 30 isles in Indonesia. They picked out what countries they were from and what part of the country. You need people like that to safeguard your facilities. The reason being you have no concept of who you are dealing with in the middle east. They want to die for the glory of their cause, and they want to take you with them. They get very near your ships, from above, from the sides to the streets. Much too near for your comfort. These are not practical things, not metallurgical.

Thank you.

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MARIA LOPEZ: My name is Maria Lopez and I represent the San Diego city. I support the concerns expressed by Environmental Coalition and Peace Resource Center, and I would like to read the names for the record that are from my neighbors who also oppose the nuclear megaport. Thank you.

(List of names and correct spellings not provided to the Court Reporter.)

H.2.81

JOE JAFFE: My name is Joe Jaffe. I'm a resident

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of Mira Mesa, been living there for about 15 years, and I would like to live there for another 15 years.

I have spent almost 50 years designing state of the art equipment for the science industry, medicine, and one of the devices that I'm most proud of was the development of ultrasonic equipment which has been used in the last 35 years for the examination of pregnant women; and the use of this equipment instead of the use of x-rays has contributed substantially to a decrease in fetal birth defects.

Mr. Beckett presented some very interesting data. I wish I could believe it. I wish these people who have presented that data who developed that data had visited and participated in a symposium last month at the New York Academy of Medicine at which the effects -- health effects of low level nuclear radiation were discussed in detail, and the evidence is mounting that these low level radiation that we have been dismissing for many years is not really dismissible. It is causing deaths, not only in cancer but in immune diseases and in other medical aspects.

I would like to say that it would be nice if we could convince the Navy that the presence of nuclear reactors in the midst of a over million residents of San Diego County did not represent a health jeopardy.

National security I don't believe is -- can be measured against the health effects that might occur in the event of all of these reactors here and the release of

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their radiation.

One of the things that has been mentioned here tonight, the gentleman from Point Loma mentioned a Three-Mile Island nuclear accident. The people there were told for the first 24, 48 hours that there had been an incident at the nuclear power plant; that there was no danger to human health. But 48 hours after the release of the immense amount of radiation then Governor Thornberg ordered the evacuation of all pregnant women and children within a five-mile radius of the plant. This has been the record of nuclear operations throughout the United States in the last 35 40 years. First you deny it and then you say, well, it didn't really hurt anybody. This is not true. I'm sorry to say, it is not true. Fortunately the people around Three-Mile Island no longer have to depend on the nuclear power plant or anybody else but themselves because they have installed a nuclear monitoring system which is under their control. They get the data, and they have the information immediately in real time and not one month or one year after the release.

If the Navy is not going to be persuaded to remove their nuclear carriers and their reactors from the San Diego area, then I wish they could be persuaded to provide the citizens of the area a monitoring system which would in real time tell them what is happening and reassuring them if the Navy is so confident that this is not going to be -- they are not releasing any extraordinary abnormal releases they would be reassured by

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this, and it would certainly improve the relationship between the Navy and the residents of San Diego.

It's not really enough for the Navy to do its own monitoring, and this is recognized by the Environmental Protection Agency which earlier this year announced a program called "Impact" which provided -- which is going to provide funds for a number of cities which are threatened by pollutants of various types including radiological pollutants. And the requirements of the people who will get these grants is that it will not only involve municipalities but it will also involve universities, research institutions and very importantly the citizens, the residents of the area who will actively participate in whatever measurements are made and have immediate access to them through this data, and that the data should be in a form which is easily recognized even by non-technical people. Lay people should be able to look at the information from these monitoring systems and be able to make a sensible judgment from that.

So I leave you with those thoughts. If you preferably remove the reactors somewhere else, that would be best. If you insist on keeping them here, please let the citizens, the residents of the area know you have a system that will tell them in real time as it happens what is being released from your reactors.

Thank you.

NORA LEAH RAMOS: My name is Nora Leah Ramos, and

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I'm representing my mom Luz Hernandez. I'm also representing the following residents of National City. The people here tonight oppose the homeporting of the nuclear aircraft carriers in North Island:

(List of names and proper spellings not provided to the Court Reporter.)

The question asked by one of the residents was how can the military defend us when it will hurt us more than the enemy?

Thank you.

UNIDENTIFIED SPEAKER: I hate to put the credibility of the Navy on line, but as a citizen of this city for 30 years I have just watched one of the major fiascoes of all time. The dredging of the harbor and getting ready for the STENNIS. And after we have had a major cost overruns, air pollution that needed to buy air credits promises to put sand on the beach of San Diego, while all we got was bombs on the beach and we got no sand yet on the beach, and we still have cost overruns; and I just heard tonight we need more dredging.

Point one: Credibility. The Navy tells me, and I used to work for the Navy, I used to work for the Sup Ship of San Diego as the chief inspector, and I watched the contractors who work. I have to remind the Navy that Navy nuclear systems were designed by the human being built by the lowest cost contractor, installed by the low cost contractor, are maintained by low bidder

contract, operated by continuing with personnel who nobody is perfect.

I also am in a financial community, and I have made a point whenever a belief is too good to be true, it is required for me to tell my clients that past performance is no guarantee of future results.

The Navy in its EIS that every time they make -- that there is only a one chance in a million for somebody to get some radiation, past performance is no guarantee of future results.

The results I believe are flawed. I believe the data is torqued. I believe the P.R. people have spent hundreds of hours.

I also have another observation about San Diego. More time has been spent in public dialogue to promote a stadium bringing in the people of San Diego than the Navy has in trying to slowly, slowly plan it, they have had it for years, to foist three nuclear aircraft carriers on the city of San Diego.

No city official would allow the local power company to build a nuclear power plant in the heart of San Diego. No city official would allow a factory that produces dust, dirt, air pollution, grit into the sand, sandblast grit, paint stamp and everything else would be permitted to be built in Coronado. The Navy has its absolute right to put aircraft carriers because they have the right of eminent domain, but they do not have the moral -- they have no moral thought. I can't even think

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of a word, capability to actually think that we should be foisted with the possibility of three nuclear aircraft carriers with the health risks with everything else.

The aircraft industry has promised us how safe it is to fly. But in Northpark, San Diego fell and killed hundreds of people and destroyed several homes. The City of San Diego can be wiped out.

I believe that the Navy will always be in existence, but the aircraft carriers need to be in a place where those aircraft carriers can be cut immediately and floated out to see without having to wait two-and-a-half hours and tide to rise to bring four tug boats to get the nuclear aircraft carrier out to sea. My defense has been weakened. My confidence in the Navy capability keep telling me the full truth and getting disclosure has been thoroughly flawed. I ask the Navy to redo their EIS and while they are doing it, please rethink the whole nuclear possibility.

Remember that past performance is no guarantee of future results.

And I thank you.

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FRANCES JIMENEZ: My name is Frances Jimenez. (Inaudible) Sherman Heights. We are agreeing with the testimony of the (inaudible), and the names are:

(List of names and correct spellings not provided to the Court Reporter.)

Thank you.

H.2.88

BILLY PAUL: Good evening. I'm sorry I wasn't here earlier, so I didn't get to hear the rest of the testimony. I was working today. My name is Billy Paul I'm president of SEAPAW. SEAPAW stands for Safe Environmental Areas, Public Access and Wildlife.

I'm president of an environmental agreement, and very concerned about the carriers coming to San Diego and any radiation or contamination of the environment that may occur. I'm also an ex-marine, and I'm proud of it. I want to welcome the carriers to be here.

My concern is that the carriers be here and not pollute. I worked at General Atomics in their nuclear fuel plant years ago. I worked there for two years. We had a couple people who were idiots in dealing with nuclear fuel. I'm sure the Navy doesn't have these kind of people. No, I am serious about that because there were a few people there who didn't know what they were doing, and being a marine I do know the training that the Navy gives the people, especially working with nuclear fuel.

There was one person there who did think if he couldn't see it it wouldn't hurt you. He took tools from the hot side worked on his car outside, also took them home. When they did a radioactive test, the radiation outside the walk by his car and the Geiger counter went off and they had to confiscate the car, squash it and haul it off to a radiation waste yard. They also had to go to his apartment and strip out the inside of the apartment and take that -- because of the

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radioactive waste that occurred there.

What is important is that this radiation does not escape, and that you monitor it, and I think people here are telling you that we want to know what's happening. We don't want the Navy to hide the facts. We want to know what's going on, and as an environmentalist I want you to protect the environment. We have too many contaminants in the bay. As you know, when the bay was dredged, we pulled up bombs and fake bombs and ammunition and several things that were dangerous. We don't want the Navy to do this anymore, and I don't think they purposely did, but you need to be conscientious.

And we also want to know what is happening and be truthful with us, and I personally want to welcome the Navy here. I would like to welcome the carriers. But please, make it safe, make sure the radiation is monitored and tell the public what is happening.

Thank you.

MARK SMITH: I'm a resident of Coronado. I support the Environmental Health Coalition and Peace Resource Center. I'd like to read into the record the names of Coronado residents who oppose the nuclear megaport who couldn't be here tonight.

(List of names attached as Exhibit 3.)

I also want to say that due to the maturation of this country's economy, many people have had to lower their expectations. I think it's time that you join the

club.

PATRICIA JALALLA: I'm Patricia Jalalla. I'll also be reading names of people who are opposing the nuclear aircraft carriers and also have supported the testimony given by the Peace Resource Center and Environmental Health Coalition.

(Inaudible. Written list of names with proper spellings not provided to the Court Reporter.)

SONIA RODRIGUEZ: (In Spanish. Not reported by the Court Reporter.)

EARL CALLAHAN: Earl Callahan, Coronado.

Mr. Beckett the Navy Nuclear Propulsion Program sitting there said tonight there are nuclear radiation releases from Navy nuclear ships, but they are infrequent, small, and do not hurt the environment. Records indicate there are also larger radiation releases not reported or reported after days or weeks.

Why would the Navy keep nuclear accidents and incidents secret? The Navy must maintain a clean public record because if they didn't, foreign governments would not allow U.S. Navy nuclear ships into their ports. They could be restricted from U.S. ports as well like San Diego. It's unfortunate that the Navy cannot tell the truth to the American public. That is why radiation monitoring stations are needed in Coronado and San Diego,

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and alarms or sirens like there are at nuclear plants should be placed in this locations so that the people could be notified immediately.

Thank you.

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PETER ECKMAN: I'm Pete Eckman. I recently came back to San Diego. My family and I have lived here many times off and on.

I'm retired Vice-Admiral United States Navy. I served for over 30 years in nuclear power. I also worked in the Department of Energy as a senior manager on their largest site and six years as an advisor in the civilian nuclear power programs. The gentleman who wanted to be the man who stayed inside the reactor will never find one because you don't go in those things. Unless they are in manufacture.

I want to talk a little bit about the costs though, not about the others. I took on the cost issue in the BRAC in 1994 because I felt that Long Beach was a better port. They had the facilities. They had the piers. They had the depth. They had the repair facilities. But the political process of the BRAC, and particularly the City of San Diego and your elected representatives, Base Realignment And Closure Commission.

You were very, very strong in your desire to see Long Beach go away, and that issue was lost, where the costs were much much higher. The risks were not a factor.

But let's get back to nuclear carriers. I

was -- I'd like to say maybe we should think how many people make decisions just on cost. And when you go buy a car, you do something, you put an awful lot of factors into besides costs. This G.A.O. study that was cited talks only about cost.

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In 1971 I was chief engineer of the carrier ENTERPRISE. We had been deployed for eight months, and then we were vectored into the Indian Ocean for another three-and-a-half months. And we were able to fill that commitment with a ship showing up about every two weeks with some aviation fuel. We were replaced by a conventional carrier. In less than a month we had to shut down all Navy operations, carrier operations in the Gulf and two carriers. We had 22 boilers en route to the Indian Ocean from Pearl Harbor and the West Coast just to support one aircraft carrier. The reason was because we couldn't get oil from the Persian Gulf. They said we are not going to sell oil to you during this particular incident that is going in the world.

Congress at that time in the 1971 deliberations of the budget and the appropriations and authorization committees of the Senate and the House -- and you can read the record if you would like, it is there in the congressional record -- said we are shifting to nuclear carriers, because we don't want this situation to occur ever again. And since that time we have been going to nuclear carriers. They may cost a little more. In the long run, that's debatable. They last 50 years. It's

sort of a wash, and on terms of cost, up front costs, are higher, but not in the long rung.

But what is the price of being able to follow those commitments? Our national authorities haven't changed their mind. The Navy has tried many times to go back to conventional carriers only to be shunned by the national authorities and your elected representatives.

So when you point at these gentlemen here in the blue suits and you talk about that, I think you are talking to the wrong people.

Now, I support moving the carriers here because we don't have very many alternatives left, and we need those carriers. So I support it. I didn't think it was the best alternative four years ago, but I think it is now. And with all my experience in this business, you know, all the fingers are still here, all that. I respect the gentleman that talks about low level radiation -- I know the system very well and I work inside the nuclear plants and plutonium separation plants and have been at officials in charge of making sure all of the safeguards are in place, very familiar with them. Yes, there is a risk. It's tiny, but it's there.

But I think the benefit of the nation and the benefit of the carrier here in San Diego, you should be the best advised to look at this thing with the broad perspective and say what is really in our best interest. Freedom's work is never done. But Veteran's Day is coming up here very soon. An awful lot of veterans, they have

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gone to a lot of places they never really wanted to go to, and a lot of ships they never really wanted to be on. Four years on ENTERPRISE my wife saw me 52 times, 52 days. There is a price to pay. It's a high price. When you get into the business of nuclear components, they are not built by the low bidder, (inaudible) has built every piece of reactor fuel ever since the NAUTILUS and continues to do so. No other company ever has. I can tell you I just came from being president of one of their companies, and they are not low cost. And I paid the Navy a systems command when I ran that. And the other component makers are not low cost. They are best quality, and the cost is way down the line someplace.

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So I just wanted to give that approach to you. I'm happy to be back in San Diego. And I say I support this initiative.

Thank you.

JULIE LOWELL: My name is Julie Lowell. I happened to be a resident of Coronado. I'm also a Navy dependent and a strong Navy supporter.

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However, I do share a lot of concerns, and safety concerns that were brought up tonight. I consider myself rather impartial party here. However, I am very surprised at some of the things I'm hearing, for example, that the Navy doesn't have a concern with the traffic in the area. That seems to be a concern of yours with Everett and also at Pearl, and yet it doesn't seem to be

an issue at this location. That very much surprises me. This morning there was over an hour delay on the bridge. Routine. Routine. You hear it every morning in the news. Bridge traffic is backed up again. You see in the local papers routinely, the traffic is an issue. I have with me tonight the local -- today's issue of the "Eagle." You have two features on the first page. One is traffic concern, and the other is the "EIS Evaluation Raises Questions," and I'd like to have that go into the record so that that can be addressed, some of the questions that come up in there.

(Attached as Exhibit 4.)

I'm very surprised that you're concerned with the quality of life issues with the crew members, and I'm pleased about that because my husband is in the military; but I don't think it can be at the expense of the community. I would like to see the Navy -- I would like to see the Navy be a good neighbor. I'm part of this organization from both sides. If you lower the neighborhood standards, the community standards, and the quality of life standards for the community, you're lowering those standards for your crew men also and your crew women and their families.

We already have traffic, over 50 percent of which in Coronado, according to the local surveys and the local independent analysis that have come about, that is created by the Navy. We have the tunnel initiative. We are hearing the Navy wants to take mitigation steps, and

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yet less than 18 percent of the morning commuters going to the Navy are practicing car pooling. That's not very effective mitigation, yet 40 -- over 40 percent of the afternoon commuters coming into the city, which is normally residential people and not Navy personnel are using the car pool lane.

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According to the tunnel proposition the expedient people that are taking steps to mitigate the problem, the afternoon commuters would do without the benefit of having the free pass lane, but the morning users that are coming to the base still get the free pass lane. That just doesn't make sense to me. It doesn't make sense to me that the Navy can't put forward any money to mitigate the over 50 percent travel that they use on the local, state and federal roads that are within Coronado backing up on 5 and past 94 today with federal money. We are hearing that the Navy can't propose any money and can't mitigate that with the Navy money. And yet we have state and federal roads that are beyond capacity, beyond any standards that are set at the federal and state level and yet there is no mitigation being done at this time, and we are proposing bringing in more traffic.

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Also I think it is somewhat suspect that we can see an increase of perhaps 50 cars increased traffic when we are saying the crew of one home port carrier is over 3,000 crew members. I mean, the numbers just aren't playing out here, and I would like to see and would like

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to know how these independent analysis are being considered, and I would seriously suggest that the EIS be re-evaluated with more factual information to provide these people with answers and factual information that they are asking for.

Thank you.

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JIM BELL: I'm Jim Bell. I have a radio show on KFMB every Sunday night during 11 p.m. We have addressed this topic a number of times.

Let me get this straight. You know, we pay our taxes to support the military, and I'm certainly not against the Navy and the other services that have served the country well; but the job of the Navy and the job of the other services is to protect our life, liberty and pursuit of happiness of the citizens of this country. How do you do that? Well, you have a world situation where we have people training terrorists, suicide bombers, whatever, to look for weaknesses in our situation, so what do we do, we bring in a bunch of nuclear reactors into the middle of the sixth largest city. Not even bear in mind the attack of carriers, all you have to do is sink something at the mouth of the bay and the carriers can't even get out of there to begin with.

And you got guys like this Bin Laden in the Middle East. This is not against Muslims or Arabs or anything, but we have terrorists that got enough money to buy any weapon that is available. It seems like we are

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setting up a pretty good sitting duck situation here with these carriers.

Not only does it make sense in terms of making the civilian population more secure, it is a bad idea for the Navy. When you give the opportunities to knock out three carriers and whatever else, destroy the whole infrastructure -- it is not just San Diego, it is the Tijuana region too. We are talking about five million people who live here locally.

I just can't see the reasoning, and I haven't heard anybody in the military tell me why clustering a bunch of nuclear carriers or other nuclear powered vessels in one area makes us more secure.

I ran for Mayor of the City of San Diego in the last election, actually I came in second on six candidates, but I didn't have much money. But I guarantee you if I had been Mayor, there would have been a whole different picture here.

Thank you very much.

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RUSSELL HOFFMAN: Hi my name is Russell Hoffman, and I'm not here to promote the library. Although I think that one librarian job is worth about a hundred popcorn vendors.

I want to start with a quote. I want to start with a quote. "It will do us precious little good to protect ourselves from the Soviets or any other potential aggression if in the process we poison our own

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people." I don't know if the author of that quote was referring to nuclear aircraft carriers or not, but the author was John Glenn, 1987.

I got a quote from Admiral Rickover, father of the nuclear Navy. In 1982 I believe by then his son had died from leukemia. He said, "I do not believe that nuclear power is worth it if it creates radiation. Then you might ask me why do I have nuclear powered ships. That is a necessary evil. I would sink them all. I am not proud of the part I played in it. I did it because it was necessary for the safety of this country. That's why I am such a great exponent of stopping this whole nonsense of war. Unfortunately limits -- attempts to limit war have always failed. The lesson of history is when a war starts every nation will ultimately use whatever weapon it has available." And he also said at the same hearing, "Every time you produce radiation, you produce something that has a certain half-life, in some cases for billions of years. I think the human race is going to wreck itself, and it is important that we get control of this horrible force and try to eliminate it."

My only relationship with the Navy goes back many years. This is a book called "The Last Liberty," and about 12, 13 years before I was born my father went to Germany to fight the Nazis, went to Italy to fight the Nazis on board LIBERTY ship, and you guys protected him.

Yesterday I got a call from the Navy. They are modernizing all their educational material. And I

wrote a tutorial about pumps. A nuclear aircraft carrier, any ships is nothing more than pumps, pipes, valves and vessels, and poison if it is a nuclear aircraft carrier. I wrote the C.D. ROM on pumps, and I got a call from the Navy yesterday, and they found my tutorial on line; and they wanted to know if they could use my pictures in their future training manual.

So the guy that was here who said the Navy is the most modern in the world, they are behind the times. They haven't moved up. They told me they want to eliminate a million dollars worth of printed documents. I told them go ahead and use my photos because I write interactive educational material, and I'm not really that interested in stills; and they said, oh, we can't pay you for them. I said, that's okay. Go ahead and use them. I don't mind. You save my shores from foreign aggression.

Now, I have a couple of documents here. I see the red light is already on so I'll try to be quick. This one is from 1945 by H.D. Smith by chairman of the -- department of physics of Princeton University, consultant to the Manhattan district. That's Manhattan as in the Manhattan Project of the U.S. Core Of Engineers. The document is called the "General Account Of The Development Of Methods Of Using Atomic Energy, Necessary Purposes Under The Auspices Of The United States Government," 1940 to 1945. And it starts off with the following sentence: "The ultimate responsibility for our nation's policy rests on its citizens, and they can discharge such

responsibilities wisely only if they are informed."

Okay. It closes: "The people of the country must be informed if they are to discharge the responsibilities wisely." It also says in the middle of the book here, "Properties Of Plutonium." "Although we were embarking on a major enterprise to produce plutonium, we still have less than a milligram to study and still had only limited familiarity with its properties. The study of plutonium therefore remain a major problem for the metallurgical laboratory."

So what did they do? They went to a man named John Gothman. John Gothman worked at Berkeley at the time. He has written this book called "Radiation And Human Health" since then. He is the man who isolated the plutonium for those first bombs. He knows what he is talking about, and he is against the use of nuclear reactors on board ships.

Now, that book was full of lies. It includes a statement that the health risks were covered. How could they have been covered if they didn't have enough plutonium to make your bomb. You had to go to Gothman to get it. You guys have forgotten about Gothman.

Now, in this book -- this is from -- "The Effects Of Nuclear Weapons." 1962. And it has a statement here, "The purpose of this book is to present as accurately as possible within the limits of national security a comprehensive summary of this information." And if I can find my other marker here, comprehensive

summary includes the following statement about leukemia: "It has been suggested that chronic exposure to moderate doses of nuclear radiation is conducive to leukemia." My brother died of leukemia a couple years ago.

This is a book called "Toxics A to Z." It also talks about plutonium. There is little question about the type of damage caused by exposure to plutonium, both lung, bone, and liver cancer, and leukemia are the most frequently occurring serious results of exposure. It goes on to say that the various estimates are -- of how deadly low level radiation is, vary by a factor of a thousand; and then you can't really assume that the middle ground is the right ground. The people that think it's a thousand times more dangerous than what you think, they might be right.

This book is called "Navy Ship Handling," third edition by Captain R.S. Crenshaw, Jr., United States Navy. Do any of you know this book? Any of you seen this book? It is a great book. I enjoyed it.

This book is called "Fighter In Combat Tactics And Maneuvers," and I was hoping that Al Ducane would be here so that I could get his autograph. It says "Only air power can defeat air power. The actual elimination or even stalemating of an attacking Air Force can be achieved only by a superior Air Force." It also says -- and that quote was from Major Alexander P. Jake Suversky (phonetic). I'm sure you know that name. It also says here, "We carry out" -- they know that name.

"We carried out many trials to try to find the answer to the fast, low level intruder, but there is no adequate defense." That's "Air" by Marshal J.E. Johnny Johnson of (inaudible). That's still true today. You guys are in danger of being hit by (inaudible) for instance or some other character. The SHEFFIELD during the Falklands war was hit by an XSF. That was the equivalent of our (inaudible) class that is the one that was supposed to protect the other ships from such an attack, and it didn't work.

The truth is you have a silent bomb, and you are just not admitting it; and we would like to put it away. We think there are much better methods of protecting our shores. We think that the countries that don't want you anywhere near them are going to cause you problems. We think that the people in this city have expressed their desire to not have you here with your nuclear weapons.

As I said, I love the Navy. I think you are important. I think you are doing vital work. And I wish you would do it right.

Thank you very much.

NANCY CASSIDY: Good evening. I am Nancy Cassidy.

I'm no nuclear expert, but I am a life expert. I'm a mom and a grandmother and a general manager of a 6,000 member food co-op which is directly in the path of wind currents from Coronado.

Tonight you are witnessing a local population which is waking up to the very real threat that nuclear homeporting poses to us and to our families. The following San Diegans join me in expressing concern about the nuclear Navy safety record which includes the loss in peacetime of two nuclear submarines, the THRESHER and the SCORPION with all hands aboard lost at sea.

We strongly oppose sighting nuclear reactors and nuclear storage facilities a mile from our downtown with no evacuation or warning systems for the public in place. Joining me are:

(List of names attached as Exhibit 5.)

CAPTAIN ROCKLAND DEAL: Derek, if we can hold you right there, we need a five-minute break

(A recess was taken.)

DEREK CASSIDY: Good evening. I'm Derek Cassidy, and I wanted to read into the record the names of some other San Diegans who oppose the nuclear megaport, and they are from Ocean Beach.

(List of names attached as Exhibit 6.)

And I think it's also interesting that as stated earlier, we cannot have nuclear carriers in Yokosuka, and I believe Yokosuka, Japan will not allow nuclear ships into their country, and I envy Yokosuka and wish that San Diego could become like Yokosuka and not

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have nuclear carriers.

BOB LINDEN: I'm Bob Linden, and I live in Escondido. Good evening. Buenos Noches. And good evening to the agents of the nuclear conspiracy against the people of the United States and the citizens of California and San Diego.

We keep asking ourselves what kooks would bring us so many nuks. And here you are tonight. Are you foreign subversives, terrorists eager to poison land and sea?

How did you infiltrate our borders?

Did you cleverly divert our attention to the border south of us for concern of invasion when all the while you are smiling at us under Padres caps and at Charger games making us believe -- leading us to believe you were like us. Americans. San Diegans.

But no Americans and no San Diegans would threaten our children's health and lives as you would. No Americans, no San Diegans would threaten our air, our water, animals and marine life. Indeed quality of life, property values, tourist industry, (inaudible). No true American, no true San Diegan would concoct a plan that plunked so many nuclear reactors that are nuked under such a populous American city and irresponsible and contemptuously risk American lives with no emergency notification or evacuation plans.

No true American would showcase such disdain

for democracy and such disdain for the will on the people and in so doing squander eight thousand million taxpayer dollars per vessel to build nuk over conventional, when the U.S. government's general accounting office proclaims no strategic advantage of nuk over conventional.

Don't you read your own government reports, or haven't you special interest bomb terrorists infiltrated that department yet.

True, Americans would want to use those savings for salaried increases for Navy personnel. The true heroes of the Navy who, let's face it, are the ones most likely to contract the tumors and cancer and leukemia of your deadly folly.

If your plan continues and we must rename our waterway, "Emission Bay," when your nuclear conversion becomes the perversion of America's finest city to "America's frightest city" or "America's finest toxicity," how will you live with yourself? How will you sleep with yourself at night?

We expect principle, honor and integrity from our people in the services. We expect and get less from politicians who are supposed to protect the public, and we get "Nuk Waste Wilson" and a "Sellout Susan Golding" off today trying to attract the Super Bowl here, but they probably know in the future there will be travelers' advisories. Attention NFL fans, travel at your own risk. San Diego is now the nuclear megaport and the nuclear dump. Please pack a lead jumpsuit to wear at the stadium.

H.2.102 H.2.103 H.2.104 H.2.105 H.2.105 H.2.106

H.2

Bring radiation block instead of sunblock. Free Geiger counter with car rental. And bring the family back to San Diego your radiation vacation destination.

Gentlemen, we the people are here tonight to demand that you do the right thing. Terminate the nuclear occupation of San Diego. Your nuks are not welcome here. No new ones, and STENNIS the menace has got to go. Don't be a disgrace and embarrassment to your uniform. It's a sad day when America is under attack by and needs protection from its own Navy. Don't do the evil that will cry out four future Court Marshal investigations and trials.

Come on, guys, join the human race. Be a part of civilization. Remember many centuries after your great grandchildren have long been buried, the waste that you decide to leave behind will still be here.

Do you want that to be your legacy?

UNIDENTIFIED SPEAKER: Good evening. I hope to offer a view which hasn't been expressed yet, which I hope will get us both off the hook and on a new path. I'm a resident of San Diego. I'm a member the Peace Resource Center, and I wish to publicly thank Karen Jankow for all that she has done, and her passionate concern to keep this issue alive.

While I can't speak for these other organizations of which I am a member and a board on two of them, the United States Nations Association, San Diego

(inaudible) Economic Conversion Council, League of Women Voters, the Audobon Society and Sierra Club, many colleagues of those organizations share my views but do not speak for the organizations.

I join the Secretary of the Navy William Cohen, Secretary Of Energy Bill Richardson, Vice-president Gore, and President Clinton, and their testimonials quoted in the statements recognizing the 50th anniversary of naval nuclear propulsion program, its record of achievement.

However, their words speak of a past record. I am concerned about the future, specifically January 1, the year 2000. My concern arises out of more recent statements of these four leaders together with Senator Robert Bennett and Chris Dodd, co-chairs of the Senate Committee of the year 2000 problem or 2000 bug or Y2K together with representatives Steven Horne and Connie Morella, co-chairs of the House committee on the year 2000 problem.

The Senate committee has raised serious questions about the Y2K safety of nuclear generating plants. This concern must extend also to the naval nuclear propulsion systems. The House committee based on the study of federal agencies' efforts toward year 2000 compliance and a study done by the House by the office of management and budget revealed at an across the board average of a D grade of federal agencies. And as Representative Horne said, no one graduates from college

with a D average. The '98-'99 budget bill last week was augmented in the last days by $1 billion specifically stuck in there to help the Department of Defense play catch-up in its efforts to certify as compliant with military computer clocks safely turn over from 99 to 00.

I have four urgent questions on the naval nuclear propulsion plants:

One, has the Navy begun the assessment of it's compliance for emission critical systems?

If not, why not?

If yes, has the Navy begun remediation for compliance?

And if, yes what is its status?

Third, has the Navy begun testing its remediation efforts for integrated compliance?

Four, if not yet begun testing, when will it begin -- when do you expect to be certified as compliant ready for the computer clocks to roll safely from 12-31-99 to 01-01-2000?

Thank you.

H.2.108

H.2

MICHAEL IVORY: Hello. My name is Michael Ivory.

And I have been a commercial fisherman in San Diego Bay since 1985. I have operated in the proximity of the South Bay, San Diego Gas And Electric power plant, and over the years I have accumulated dozens and dozens of tumored fish, diseased fish, ranging in attractiveness from disturbing to nauseating. There is specific problems

H.2.109

related to power plants and discharge on the marine environment.

One of my big questions is, you're going to be having three nuclear carriers in San Diego each with two nuclear reactors, which means you are going to be pumping bay water to use for your cooling systems, and I would like to know what kind of chemicals that you use to clean your heat exchange system.

Do you use chlorine?

Can you tell me that?

(Mr. Beckett shakes head.)

It's pretty darn scary to see this come to San Diego. It's not a question of whether we are going to have an accident, it's when.

Like I say, San Diego Bay is a very fragile ecosystem. We have green sea turtles, a lot of rare fish. It is probably the most unique bay in California.

I just shutter to think that we have got three nuclear carriers on their way to town. I hope it doesn't happen.

Thank you.

Also I'd like to complain that I was told that we would be called in order of turning our cards in, and that certainly hasn't happened. If you run your safety facilities the way you administered this meeting I think we are all in big trouble.

H.2.109

H.2.110

GINNA McDONOUGH: My name is Ginna McDonough. I'm

H.2.111

resident of Coronado.

And what I'd like to state first of all is that it's about time there was a hearing held here in San Diego of this matter. For three-and-a-half years now since I have been involved in this, everything has been purposely, I think, isolated on Coronado so that the Navy could make it seem like it was strictly a Coronado problem. A lot of people left, it's getting late, but I think you saw by the people here that it is not just a Coronado concern. It's about time this happened.

Anyway, nice to see you gentlemen, again, by the way. And I don't know who these two people are. Are they connected with you? I would like to know who they are. They have been here at the whole meeting in the background.

I'm Ginna McDonough.

You are?

DR. ANDREW LISNER: Andrew.

GINNA McDONOUGH: And your function here is?

DR. ANDREW LISNER: We are with SAIC. We are helping the Navy on the project.

GINNA McDONOUGH: And you are?

JOHN: My name is John.

GINNA McDONOUGH: And, John, what do you do?

JOHN: I work with the Navy.

GINNA McDONNOUGH: I'd just like everything even.

You know, I guess having been involved with the opposition -- by the way, I came here to support the

H.2.111

views of the Environmental Health Coalition, but maybe you already knew that, the Peace Resource Center, all the other organizations and individuals here represented tonight, I'm in opposition to this project. I have been for a long time. And I'm seeing many of you people come and go through all the different hearings I have been through, and to be perfectly honest with you, I'm sure you are all nice men. You probably have families and children of our your own, but you are under orders here to be here. You are really not paid to think, you are just paid to sit and listen to us.

I have a problem with that because we get no response from you no matter what. I know this is not a question-and-answer period, but I don't feel like any of the concerns have ever ever been answered in the series of these whole Navy hearings. One thing that I would like to know, I was told early on in this process that fueling and defueling would never happen at North Island; that all of that would be conducted on the east coast in Northern Virginia or wherever that is based over there.

Well, this really doesn't make sense to me because if there are going to be two home ports here in the Pacific, what sense does it make by the Navy's standards to be taking all of those carriers to the east coast to be fueled and defueled. I have a feeling my suspicion is well, obviously, you have been so honest and straightforward with us so far, that that's going to happen here at some point.

H.2.111

H.2.112

H.2

I want to know if that is, and I want your assurance that it is never going to happen. H.2.112

Also, one of your transparencies or slides up there says that in the event of an accident civilian services will be sufficient to deal with whatever might happen. Well, I have been a Coronado resident for years. I know many of the police officers and personnel. I know many of the fire department personnel and emergency response people. I have talked to a lot of them. None of them have had any coordinated efforts with any of you people how to deal with any sort of an accident. H.2.113

Now, we have two fire stations; one that's in the city proper and one that's down at the Cays. At any given time there is three personnel at each station. A lot of the -- especially with the fire department -- a lot of the personnel live off of Coronado. Now, in the event of any kind of emergency, whether it's an earthquake, whatever, God knows what, they are not going to be able to get back to Coronado to help with any kind of problems. There is going to be maybe a total for our whole city five to six people in the emergency services with the fire stations.

Police station says the same thing. They don't know anything about what you people are planning. They haven't been at meetings to coordinate any kind of joint effort. This is a huge mistake as far as I'm concerned.

So the civilian plants are not sufficient,

whatever your sign may say. H.2.113

The risk assessment you use, I'm sorry, are terribly flawed because you state that it's 50-mile radius where the risk assessments are -- I don't know, calculated for. So you are saying that someone who lives in El Cajon is under as great a risk as I am living right next to it. Well, that's absolutely absurd. H.2.114

Also, well, I own a small health food store in Coronado, and I hear so much stuff which obviously people will assume is only anecdotal evidence. But in the last five years I have been in business, I can't -- I am catalogueing it, so eventually I maybe will be able to present some kind of report, but of the residents of Coronado there is a huge increase in skin and eye irritation, problems with respiratory illnesses and allergies and asthmas. I know in the last year eight women personally who have miscarried. All women have had healthy pregnancies up until now and have miscarried for like very weird, you know, very weird circumstances. I don't want to go into the details. H.2.115

This to me represents -- I'm not blaming all this on the Navy, please understand -- but we in San Diego are already at toxic overload, and you are asking us to assume more. I don't want anymore. I'm finished with it.

Last year the American Lung Association came out with the board saying that San Diego has the third worst air quality in the entire country, and you are asking me to accept more pollution, more air pollution.

That dredge was a total farce. I was in this hearing room three times on three separate occasions when the Navy had to come back and ask for variances on their (inaudible) because they needed to spew more into our atmosphere. A dredge machine that was calculated as -- I can't remember how many hundreds of thousands of vehicles it was the equivalent of putting through our air. The health of this community is already at risk. I don't want to accept any more. That's it. I'm done.

Thank you.

H.2.115

JOE BACON: Yes, good evening. I'm Joe Bacon. I have been a resident of Coronado for 11 years. My family has had roots in Coronado for over 50 years. My grandfather was an Admiral in the U.S. Navy. My uncle and my father both served in the U.S. Navy.

I would like to say that I really put my health first, and I really feel that the Navy will probably go along with this project because it's economically feasible and because there is probably little alternative in the short range.

H.2.116

But I would voice my concern that the Navy could work with the community in putting up some kind of a monitoring system so that people can feel a little better when they go to bed at night. And that's not just people in our community, that's people in the naval community as well who would like to know if their children are at risk of getting some kind of radiation which could cause bone

H.2.117

damage and cancer in the future.

H.2.117

Now, I know you are probably going to make your decision based on a military point of view. So I have a military question I want you to consider, and that is, what military risk does the Navy envision in bringing more boats, more carriers, and more personnel to Coronado? And this would be a risk which could come from a foreign country which has got new super advanced guidance systems and missiles, for example, the Chinese.

H.2.118

And in layman's terms I suppose we could say that does San Diego become a potential Pearl Harbor target, and if so, what plan does the Navy have to do about it?

Do you really feel that bringing more ships and personnel into Coronado in spite of it being economically feasible is good military strategy from this point of view?

My grand father was in Pearl Harbor, and I can say I would say that's not a mistake that would be repeated.

Thank you.

PENNY McCLELLAN: My name is Dr. Penny McClellan, and I am no stranger to the Navy either. I have been a member of the Navy league. I'm also a former employee at the Navy Ship Research And Development Center back in Bethesda, Maryland.

H.2.119

I'm not here representing anyone other than

myself at this point. I have been a resident here for 18 years, and my concern is about what the nuclear carriers bring to San Diego.

It's been a long night for you I know, and for us as well. There has been a lot of information. And my deepest concern at this point, because you are our neighbors, our friends and our family, and we all share San Diego, there is a lot that's been presented tonight about what the nuclear carriers are going to bring and potentially bring to San Diego.

And the safety risks for those of us individuals for our ecosystem, for members who work closest or live closest, I can tell you one of my deepest concerns has been the process of this. I heard about this on the news last night, changed all my plans, all my appointments to be here tonight. There wasn't much notice. The doors were locked downstairs. We have been in a heated room for a long period of time. I saw no press coverage other than maybe briefly when the Navy spoke. I have been part of the Environmental Impact Studies. I have seen how the Navy works, and I know that you have a plan set in motion.

But I appeal to each of you as individuals and not just someone who obeys commands and does, quote, your duty. And that is as an individual I really want you to take this part and not a matter of you have to sit here and you have to put up with the abuses all night long. I think that there are really some important things that

H.2.119

H.2

were said, and if you listened to what people are saying, we don't want the nuclear carriers here. Not that we don't care about the Navy, but we don't trust that anyone could handle that situation without incredible risks, and we have talked about a lot of those tonight. Everything from terrorists actions, to accidents, I mean, if you have been part of the system, as I was part of research, there is going to be accidents for it's human. We make mistakes. This is not something we can make mistakes on. We have possible storage of nuclear material. I hear all kinds of rumors. We are in an earthquake zone here.

I really want to feel that those of us who have come tonight and spent all this time that we have been heard. And that's what worries me the most, is that all the information and we have had -- I have been impressed with some of the expertise we have had. Everyone from fisherman noticing what's happening to the fish, to doctors talking about the effects of low level nuclear waste. And I really want you to take this at heart, because we really don't want it here. We are really afraid of it.

Thank you.

H.2.119

JEAN BRUCHIERS: My name is Jean Bruchiers, and I know you have heard from a lot of people, so I'll try to be short.

H.2.120

You have heard from a lot of people, and you have been given so many reasons why not to do this. And I

don't need to go over the long list of all these reasons why not.

Basically I'm here to say that the people concerned about this are the community here. We are the community here. And the people objected to this. When I look around the room and I hear the names being read, you are not from here so maybe you don't recognize what those names mean; but I have worked in the community. The people here of this community, we recognize those names, and those are the community leaders, the people that provide the very services and training to the people in need, the people of expertise in our community. Many of the people have left that you have heard the names -- they are busy people with a lot of responsibilities, that they -- information that they could impart. These are a wide section of our community that is objecting to this, and these are the people that make the real improvements to this community that otherwise -- frankly this community might otherwise explode in rage and, you know, if you are thinking am I trying to threaten you somehow, the answer is no. This is threatening us. This is threatening our very lives, our health, our way of life, and we are the people that live here.

And, you know, you have heard so many people, I'm wondering are you even listening anymore. I hope you are, and, you know, I hope you are taking lots of notes; and I just want to say if any of you really serve any role at all in making the decision in this process, any

H.2.120

H.2

authentic input of the role on this, I ask you to please -- we are the ones that you are subjecting to this, we are telling you we don't want it; and I would ask you to please work with us towards stopping the placement of these carriers here.

H.2.120

SAM FLORES: Good evening. My name is Sam Flores. I live in San Diego. First I would like to express my appreciation to Captains O'Brien and Deal and Mr. Beckett here for sitting here and listening. It is information probably given to you that might do better to your boss the Secretary of Navy in Washington. I appreciate that personally.

H.2.121

Unlike many of the speakers, I'm not quite as concerned about notification of what's going on down there. I assume I will be alerted by the mushroom cloud over the bay. Seriously.

Over the last several years I've been an Occupational Safety And Health coordinator for my company. And as much as I cajole and train and inspect my fellow employees, they are fallible. And I really found we are only as good as our last accident.

The last 50 years or so we have never had a person fall through a skylight until it happened this summer. By the Grace of God the person wasn't hurt. The roof project was done by competent people, and in retrospect we find it wildly flawed.

I trust, and I'm sincere in that trust that

our sailors are much more motivated, as I think anybody would be living 300 or 600 feet away to nuclear reactors, and less fallible than our employees.

However, I do remember some number of years ago that a battleship -- I'm not sure whether it was the NEW JERSEY or not -- but one of the main guns blowing up on that which actually had never happened until it happened.

Finally, while the risk of a major accident or incident -- I know the safety terminology also -- may be small if the results are so dire, then the risk logically is unacceptable.

Thank you kindly.

H.2

H.2.121

CAPTAIN ROCKLAND DEAL: Those are all the cards I have. Does anyone wish to speak this evening? Anyone at all?

All right. Thank you for your attendance this evening and for your input.

UNIDENTIFIED SPEAKER: When will we be notified of any other hearings?

CAPTAIN ROCKLAND DEAL: First of all, let me say the closeout for written comments is 12 November for this period, and it depends on how long it takes us to answer all the questions that have been entered in five locations that we have held five public hearings before the next

document is released.

UNIDENTIFIED SPEAKER: Will they be answered in that document?

CAPTAIN ROCKLAND DEAL: Yes. Every written, every oral comment will be answered in that document, and those whose names we have will receive a copy of the answer.

(The hearing was concluded at 10:20 p.m.)

--oOo--

SD Co. Hearing 10-28-98 Comments in Spanish

Luz Palomino

Good evening. My name is (Unintelligible) and I live at 2463 (Unintelligible) street, San Diego.

(Unintelligible) the nuclear aircraft carriers and the nuclear wastes plant will bring to our streets and our people. I neither understand why none of the documents regarding this project were translated into Spanish, nor do I understand why this is the only hearing that was held in San Diego. H.2.79a

My community is very, is already very infected. There is terrible pollution caused by industrial emissions and disposal of toxic wastes.

H.2

Fish in the bay are totally polluted. They cannot swim. It is not healthy to eat them. H.2.79b

One of the important aspects of this project was not analyzed in the documents that recently, that recently three local shipyards were bought by defense contractors. H.2.79c

The buyers said that the reason for the purchase was the promise of having a site for nuclear repairs.

This will even bring more pollution to our community and is an indirect impact (Unintelligible) nuclear aircraft carriers. This was never mentioned in any previous document.

I live down the hill. Take this into consideration. If there is an accident, my family and the families in this entire community will be at risk.

(Unintelligible)

Sonia Rodriguez

I oppose it. I do not want any more nuclear aircraft carriers in San Diego. H.2.93

(Unintelligible)

I (Unintelligible) the list of the names I am going to read represents the area of (Unintelligible) and we agree on the testimony from (Unintelligible)

Hilaria Cañuelas
Cintia Palacios
(Unintelligible)
María Gonzalez
Agustín Salgado
Valeria Pérez
Delia Gonzalez
Nieta Lisboa
Sandra Gómez
Cecilia Randell
Hector (Unintelligible)
Silvia Hernandez
María Flores
Jesus (Unintelligible)
Davici Martinez
Celia López
Teresa Durán
Mark Zoraino
Daniel Murillo
Silviano Palomino
Joaquín Balboa
Omar López
Araceli Pérez

Carmen Brandes
María de La Sana
Ofelia Brandes
Heredia Galíndez
Esperanza Verón
Mario Torero

(Unintelligible)

Angeles Velázquez
Rosario Miguel
(Unintelligible)
María Sánchez
Alfredo Sánchez
Angélica Guerrero
María Navarra
María Rosales
Guadalupe Echeverría
Leticia Delgado
(Unintelligible)
Violeta Flores
Cecilia Medina
Ariel Espinosa
Miguel Rodríguez
Teresa (Unintelligible)
Terence Ramos
Candelaria López
Paula López
(Unintelligible)
Laura Rosales
Nora Molina
Mariana Linares
Helena González
Rosa Richmond

H2

Guadalupe Rosa
Cristina Ledesma
Marta (Unintelligible)
Guadalupe Hernández
Guadalupe Miranda
Sara González
Mónica Villegas
Stephanie García
Soledad (Unintelligible)
Verónica Martínez
(Unintelligible)
Josefina Romero
Antonio Tara
Cristina Ramirez
Gloria Espinosa
Cristina Bautista
Delia Figueroa
Jessy Barroso
Enrique Gala
Francisco Rodríguez
Agustina Rodríguez
Stephanie Romero
Florida Susana
(Unintelligible)
Heredia Medina
Guadalupe Medina
Ana Camacho
Helena (Unintelligible)
María Gimenez
Catalina Palacios
Paula Cristina Maldonado
Cristina Romero

Thank you.

Audiencia SD Co. 28/10/98 - Comentarios en español

Luz Palomino

Buenas noches. Mi nombre es (Ininteligible) y yo vivo en el 2463 de la calle (Ininteligible) San Diego.

(Ininteligible) de los portaaviones nucleares y la planta de desechos nucleares traigan a nuestras calles y a nuestra gente. Tampoco entiendo por qué ninguna de la documentación sobre este proyecto fue traducida al español. Ni tampoco entiendo por qué es la única audiencia que se ha llevado a cabo en San Diego. H.2.79a

Mi comunidad es muy, ya está muy infectada. Es una gran contaminación generada por las emisiones industriales y los desechos tóxicos.

Los peces de la bahía están muy contaminados. No pueden nadar. No son sanos para comer. H.2.79b

H.2

Uno de los importantes aspectos de este proyecto no fue analizado en la documentación que recientemente. Que recientemente tres de los astilleros locales fueron comprados por los contratistas de defensa. H.2.79c

Los compradores han dicho que la promesa de un lugar de reparación nuclear cerca fue el motivo por lo cual compraron.

Esto traerá aún más contaminación a nuestra comunidad y es un impacto indirecto del (Ininteligible) de portaaviones nucleares. Al cual nunca fue asesorado en ninguno de los documentos previos.

Yo vivo cuesta abajo. Por ejemplo esto. Si hay un accidente, mi familia y la familia de toda la comunidad entera está en riesgo.

Y me opongo. No quiero más portaaviones nucleares en San Diego. H.2.93

(Ininteligible) H.2.93

Sonia Rodriguez

Yo (ininteligible) la lista de los nombres que voy a leer representamos el área del barrio (ininteligible) y estamos de acuerdo con el testimonio de (Ininteligible)

Hilaria Cañuelas
Cintia Palacios
(Ininteligible)
María Gonzalez
Agustín Salgado
Valeria Pérez
Delia Gonzalez
Nieta Lisboa
Sandra Gómez
Cecilia Randell
Hector (Ininteligible)
Silvia Hernandez
María Flores
Jesus (Ininteligible)
Davici Martinez
Celia López
Teresa Durán
Mark Zoraino
Daniel Murillo
Silviano Palomino
Joaquín Balboa
Omar López
Araceli Pérez
Carmen Brandes
María de La Sana
Ofelia Brandes
Heredia Galíndez

Esperanza Verón
Mario Torero

(Ininteligible)

Angeles Velázquez
Rosario Miguel
(Ininteligible)
María Sánchez
Alfredo Sánchez
Angélica Guerrero
María Navarra
María Rosales
Guadalupe Echeverría
Leticia Delgado
(Ininteligible)
Violeta Flores
Cecilia Medina
Ariel Espinosa
Miguel Rodríguez
Teresa (Ininteligible)
Terence Ramos
Candelaria López
Paula López
(Ininteligible)
Laura Rosales
Nora Molina
Mariana Linares
Helena González
Rosa Richmond
Guadalupe Rosa
Cristina Ledesma
Marta (Ininteligible)
Guadalupe Hernández

H.2

Guadalupe Miranda
Sara González
Mónica Villegas
Stephanie García
Soledad (Ininteligible)
Verónica Martínez
(Ininteligible)
Josefina Romero
Antonio Tara
Cristina Ramirez
Gloria Espinosa
Cristina Bautista
Delia Figueroa
Jessy Barroso
Enrique Gala
Francisco Rodríguez
Agustina Rodríguez
Stephanie Romero
Florida Susana
(Ininteligible)
Heredia Medina
Guadalupe Medina
Ana Camacho
Helena (Ininteligible)
María Gimenez
Catalina Palacios
Paula Cristina Maldonado
Cristina Romero

Thank you.

The San Diego
Union-Tribune.

WEDNESDAY, SEPTEMBER 2, 1998

Public needs information about the nuclear carriers

By Bob Filner

While the military downsizes overall, its activity is increasing in San Diego. Currently, San Diego houses over 67,000 military personnel, and this number is expected to increase in the future as a number of key projects come on line.

While we all applaud the economic benefits brought to us by the Navy, we also want the Navy to respect all aspects of our quality of life. The noise and air pollution from the new Marine helicopters coming to Miramar have been hotly contested by residents — with inadequate response from the Department of Defense.

Perhaps most important, the Navy is aggressively building a nuclear megaport in San Diego Bay — and many in the San Diego area have been kept in the dark about what is coming.

On August 26, the John Stennis, the first of an expected three nuclear-powered aircraft carriers, arrived to be homeported in San Diego. To accommodate these ships, 9 million cubic yards of sediment was dredged from San Diego Bay, and radioactive and hazardous waste facilities are being built on North Island. What are the impacts to the bay from this massive dredging project? What public health risks are created with the presence of nuclear and toxic waste? What could happen in the event of an accident?

Many San Diego residents have been asking these questions, and raising concerns, as they are allowed to under the law. They have utilized the processes that are available to them — attended public meetings, written letters and requested information through the Freedom of Information Act.

Information has been slow in coming, if it comes at all, and Channel 8 reported that some of these people have themselves been investigated by the Navy. While I support the Navy, I believe that any governmental agency that doesn't divulge information upon request but instead tries to do background checks on the citizens requesting information, should itself be investigated.

San Diego area residents have a right to know about and participate in decision-making about major changes to our region. Compared to the debate over stadiums and ballparks, information and discussion about the arrival of the nuclear powered aircraft carriers has been virtually nonexistent.

There is a high-level public task force to examine the Padres ballpark proposal — yet no such body exists for the nuclear megaport project. In fact, in the 4 years this project has been under development, there has never been a meeting about the entire project!

There should have been much more openness about this project from the beginning, but it is too late. The public is now demanding a far more open discussion about all the ramifications of the nuclear megaport project — and they deserve to have it. There have been serious accidents at other nuclear ports and on nuclear-powered vessels. The Navy has to explain these and the potential for future ones, honestly and straightforwardly, to the San Diego public.

The Navy should open up the process to discuss the risk of nuclear accidents and the evacuation that should be in place and the ongoing hazards associated with the

There should have been much more openness about this project from the beginning.

transportation and management of toxic wastes so close to populated areas and natural resources. I have formally asked the Secretary of the Navy, John Dalton, to make sure this happens.

Members of the public have requested that the Navy broaden the public hearing process for the environmental impact statement associated with the second carrier. To its credit, the Navy has responded positively and has agreed to hold a hearing in San Diego on Wednesday, Sept. 30 at 7 p.m. at the County Administration Building on Pacific Highway. That hearing is in addition to one that already had been scheduled for Tuesday, Sept. 29 at 7 p.m. at Coronado High School.

These are good first steps. I call on the Navy to go further, however, and provide complete information at that hearing about the entire Nuclear Megaport Project. That means analyzing the potential environmental and public health impacts from all three carriers and the associated waste handling operations and disclosing the emergency procedures that will be utilized in the event of an accident.

The economic benefits derived from Navy operations must be weighed against the potential harm that may be caused. Only when all of the facts are on the table will San Diego be able to make a truly informed decision about this critical aspect of our region's future.

FILNER represents the 50th Congressional District, which includes much of South San Diego.

Exhibit No. [illegible] Castillo
For Identification Public Hearing
Date 11-28-98
Marilee Jolines

H.2

A Short History of Naval Nuclear Accidents

According to the Navy, "...there has never been a reactor accident in the history of the U.S. Naval Nuclear Propulsion Program..." (1995 FEIS, p.I-75). However, according to Navy records obtained through Freedom of Information Act Requests (FOIA) and independent research on the subject the following accidents have occurred and resulted in releases of radiation into the environment.

1. Release of Radioactive Steam, 1996 - USS Arkansas

Release of radioactive steam from a nuclear powered vessel at the Puget Sound Naval Shipyard. The Navy waited 15 hours to inform the State and did not inform the public until an informant called the press. (*Bremerton Sun*, 3-5-96)

2. Radiation Contamination of Sailors, 1997-- USS Portsmouth

USS Portsmouth (SSN 707) two SubBase workers were exposed to radiation during radiological work. (*Navy news release issued 04-28-97*)

3. Radiation Contamination of Sailors, 1995--USS California

Three crew members were contaminated with small amounts of radioactivity after 100 gallons of radioactive water spilled from the ship's propulsion system. One sailor was burned with 160-degree water during an accident involving testing of equipment in the cruiser's reactor compartment. (*Union Tribune*, 6/4/95 and *Navy Times*, 06-19-95)

4. Release of Radioactive Water into San Diego Bay, USS Truxtun, 1979

Thirteen gallons of radioactive "high-purity water" was spilled into San Diego Bay on September 2, 1979. Initial reports stated that the ship spilled as much as 80 to 100 gallons of radioactive water.(Neptune Papers, p57)

5. Release of radioactive water into San Diego Bay, USS Gurnard, 1980

The submarine USS Gurnard spilled 30 gallons of water containing radioactive material into San Diego Bay on July 20, 1980 (Neptune Papers, p.57)

6. Repeated releases of radioactive water released into US Ports, USS Long Beach

The cruiser USS Long Beach reportedly leaked hundreds of gallons of low-level radioactive water in five Navy ports because of a malfunctioning valve, including a total of 159 gallons of primary coolant while moored in San Diego. (*Union Tribune*, 11-27-91) Excerpts from that article by Greg Vistica, are worth repeating:

"...Copies of pages from a log on the ship that lists discharges of radioactive liquids were brought to the San Diego Union by concerned sailors who accuse the Navy of sacrificing safety in order to meet scheduled operations...Four of the sailors on the ship, over an undetermined time period, have developed cancer, the crewmen said. Two had brain tumors and two had leukemia..."

Prepared by Environmental Health Coalition, 1717 Kettner, Suite 100, San Diego, CA 92101, (619) 235-0281. Website:www environmental health.org. October, 1998

Exhibit No. 2
For Identification M. Gold
Date 11-28-98
Marilee Jolines

7. Radiation Contamination of Sailors, 1973--USS Guardfish

Contamination with radiation of 5 sailors aboard the USS Guardfish in 1973. Documents released under FOIA. What is interesting about this accident is that the Navy has repeatedly refused to release the report of investigation for this 25-year old accident. EHC's appeal of this denial has also been denied by the Navy.

8. Release of radiation, 1977, USS California

Discharge of primary coolant water on two occasions and many reports of sailor misconduct when on duty for nuclear plants on the ship.(11-20-77, *Virginia Pilot*)

9. Release of radiation- USS Enterprise

A radiation accident caused a $6 million clean up when a shipyard worker improperly welded a propulsion system valve contaminating 9 workers and 4 compartments. USS Enterprise, while in dry-dock in early August, 1994, experienced a fire in the reactor room leading to a spill. (Navy Times, 07-31-95)

10. Release of radiation kept secret, USS Guitarro, 1989

This vessel dumped at least 235 gallons of radioactive coolant into the harbor in Guam. This incident was kept from the public for six months. An official from the U.S. Naval Institute stated "*Any spill is potentially dangerous..if it happens with a small amount it can happen with a large amount.*" (*Union Tribune* 6-14-90).

11. Release of radioactive water, USS Nimitz, 1980

Navy admits to a primary coolant leak on 11 May 1979. The accident record of the Nimitz-Class ships as released to Greenpeace in 1991, showed that Nimitz-class ships have been involved in more than 40 incidents over the last two decades, with at least five accidents in California ports. (Neptune Papers p.6)

OTHER ACCIDENTS/INCIDENTS OF CONCERN

1. Dangerous Working Conditions in the Nuclear Navy, 1996--DSU Mystic

Excerpts from the FOIA documents received regarding the mercury spill into San Diego Bay in the NASNI Turning Basin by the Nuclear Navy Submarine personnel aboard the DSU Mystic. The Navy released the court-martial transcript to us as well as many other documents demonstrating fatigued personnel, impossible scheduling, and an overworked crew. The Engineer of the Mystic even had a breakdown prior to the incident. One crewman received a court-martial for making false statements and for dereliction in performance of duty. There are 155 documents still denied to EHC regarding this accident even though it did not involve radiation, or even a nuclear vessel, and there is no litigation threatened or pending.

2. Evacuation of a Navy Nuclear Facility, 1998- Naval Reactors Facility.

The Associated Press reports that 200 people were evacuated from the Idaho Naval Reactors facility on May 21, 1998 when elevated radiation was detected.

3. Falsification of Documents, 1995--USS Salt Lake City

Navy investigation documents stating that falsification of documents was a common occurrence aboard the USS Salt Lake City and was one of the reasons for the removal of the Commanding Officer. Documents provided under FOIA. Commander was removed from post due to a lapse in regulation resulting in an intoxicated submariner serving watch of a nuclear reactor on a submarine in San Diego Bay (*Union Tribune*, 11-11-95). Naval investigation documents revealed that falsification of records was a common occurrence on this vessel. (Documents released to EHC under FOIA)

4. Alleged Sabotage, 1996-- USS San Juan

News article from regarding potential sabotage aboard a nuclear powered submarine in 1996 in Groton, CT. A sailor was relieved of duty due to suspected sabotage of a nuclear reactor on the USS San Juan, a fast-attack nuclear submarine in Groton, CT. Wires were severed that supply power to retract the reactor's control rods which dampen nuclear reaction. (*Union Tribune* 08-23-96) EHC has requested documentation on this incident.

5 Bomb found on carrier, USS Constellation, 1996

A bomb was discovered aboard carrier U.S. Constellation while it was docked at North Island. (*Union Tribune* 1Dec96)

6. Weapon detonation accident, USS Sargo, 1976

Excerpt from an investigation interview regarding an accident in which a weapon detonated, low order on an in-port nuclear submarine. The Navy released over 600 pages of documents to EHC regarding this accident. A fire (unclassified Navy investigation documents, p. 1074) and a low-order detonation of the warheads that were attached to two conventional torpedoes on the nuclear-powered submarine USS Sargo on June 14, 1960 (Finding 18 of final investigative report of the Judge Advocate General concerning an explosion on board the USS Sargo on June 14, 1960 on file at EHC). On page 225 of the Final investigative report of the Judge Advocate General, testimony of the Commanding Officer of the USS Sargo stated that"*...had those torpedoes gone off, high order, rather than low order, probably the entire engine room would have been blown in some form or another, and possibly even the bulkhead to the reactor compartment. So, there was considerable danger.* (Emphasis added)"

Prepared by Environmental Health Coalition, 1717 Kettner, Suite 100, San Diego, CA 92101, (619) 235-0281. Website:www.environmental health.org. October, 1998

H.2

Coronado

Martha Kiss	Barbara Denny	Patricia Alberda
Story Vogel	Joan Adessa	Joan Zwissler
Joe Simpson	Elizabeth Panetery	Ed Fleishman
Betty Coady	Matthew O'Grady	Lucia Rivas
Nancy Ellen Daniels	Lee Jennings	Catherine Oyster
Jane Alsup	Ardis Weise	Julie Grazian
Fred Lorenzen	Lou Georgino	Doris Georgino
Joyce Logsden	William Logsden	Judy Deans
John Deans	Stephanie Kaup	Sandor Kaup
Betty Ansel	Harold Ansel	Teresa Barden
Frances Bassett	Jaqueline Benson	Carly Caldroni
Lisa Carter	Gary Carter	Gail Clarkin
Marilyn Crehore	Laurie Curtin	John Curtin
Jeffrey Davidson	Carmen DeCordova	Ruth Gaines
Grace Harrington	Shirley Kriet	Paul Kriet
Elinor Lindberg	Alec Mackenzie	Lillion Malone
Dixie McCarthy	Bette McClimon	Shelly McGowan
Nancy McRae	Peter McRae	Tom Miller
Lynda Ollerton	Rita Perwich	Amanda Preston
Susan Ronan	Ann Schroeder	Polly Valliere
Don Valliere	Evelyn West	Marjorie Yench
Betty Tappan		

H.2

7

ELECTION
It's Voting Time: Candidate answer summary and review of local propositions. Special Section Inside

CHRIST CHURCH DAY SCHOOL "Message-In-A-Bottle" Returns After 14 Years Page 5.
CORONADO OPTIMISTS Club Members Return From Recent Junket Page 13.
SPORTS Local Action Heats Up In Youth Soccer Pages 18 & 19.

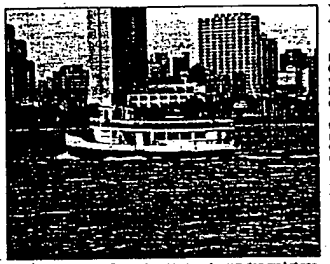
SPORTS
H2O Polo: Islander Varsity comes up big with 22-11 victory over University City High School. See Page 21.



AWARD WINNING NEWSPAPER

CORONADO EAGLE & JOURNAL

VOL. 88, NO. 44 — Published with integrity for the people and City of Coronado. — October 28, 1998



Subsidized ferry rides for Coronado residents and commuters are just one of the things that could be impacted by elimination of bridge tolls.
Photo by Karen Von den Abeel

Public Comments To Be Accepted On Toll Elimination

by Victoria Raun

Public comments on the effect of eliminating the tolls on the Coronado-San Diego Bay Bridge will be accepted until Monday, Nov. 23 by the San Diego Association of Governments.

SANDAG's board of directors accepted a report on the effects of removing the toll at their Oct. 23 meeting. Consultants for the report were Kaiz, Okizsu and Associates on traffic issues, Eric S. Schreffler Traffic Consulting on funding analysis and KEA Environmental on air and noise issues.

Bridge traffic is expected to increase to 7,200 vehicles a day by the year 2015 if the tolls are removed, the report's executive summary states.

Traffic would also increase on Third and Fourth Streets and on Orange Avenue, but decrease on Silver Strand. This scenario did not factor in the impact of homeporting two more nuclear-powered aircraft carriers at North Island, as is being proposed by the Navy.

When the impact of eliminating the toll plus homeporting two carriers was studied, SANDAG consultants predicted an increase of just over 13,000 vehicles a day by 2015. The additional traffic generated by the carriers would offset any reduction in Silver Strand traffic caused by elimination of the tolls.

Air quality would be just slightly worse if the tolls are eliminated, and no impact on noise is anticipated, according to the study.

Removing the tolls would also increase traffic at four Coronado intersections which are already at the lowest measured level of service for drivers.

Traffic signals, an additional left turn lane at Fourth and Orange and the proposed tunnel from the bridge to North Island would all help pedestrians and drivers, according to the study.

An a paragraph discussing traffic calming, the report notes: "Residents in Coronado have experienced a division of their neighborhoods during peak commute hours." It goes on to recommend possible traffic calming measures, including leaving the toll booths in place even if the toll is eliminated.

Currently, bridge tolls help fund various forms of public transportation and the study discusses possible ways of attempting to maintain bus, ferry and van pool ridership by using other fund sources.

Copies of the study are available at City Hall and the Coronado Public Library as part of the Oct. 20 council agenda.

Comments on the study may be sent to SANDAG, attention Craig Scott at 401 B Street, Suite 800 San Diego, CA 92101 or e-mailed to Scott at csc@sandag.cog.ca.us.

Allegations Of Impropriety Are Voiced About Local Campaigns

by Jo Benoit and Victoria Raun

Allegations of campaign improprieties are being traded between the camps of opposing candidates in the Coronado City Council races.

Complaints have been filed concerning the campaigns of Bruce Williams and David Blumenthal, current city council members running to hold their seats; and concerning the support of two other officials, Mayor Tom Smisek and Councilmember Patty Schmidt, for candidates Moza Wilson and Chuck Marks.

Charges that Williams and Blumenthal received improper campaign contributions are moot, according to the special counsel hired by the city to advise on legal questions arising from the election. "City law prohibits political contributions from people with business contracts with the city. One of the issues raised, but not answered, is who is considered a city contractor."

The special counsel has not made any determination on the allegations about Schmidt and Smisek, which centers on regulations regarding political committees. Individuals can't make contributions of more than $200 each to an individual candidate ($400 for a married couple), but committees, which often collect contributions from individuals, are exempt from the $200 limit. It is also unclear if a married couple making a combined contribution of under $400 must declare themselves a committee."

In a written report to City Manager Homer Bludau, the special counsel, attorney William R. Baber, outlined a series of actions resulting from allegations concerning contributions to the campaigns of Bruce Williams and David Blumenthal, both incumbent council members.

Baber stated that he plans no further actions in the matter, as both Williams and Blumenthal returned the funds in question.

Pre-campaign financial statements show contributions to the Williams campaign included $200 from Daniel Parker, $200 from J. Douglas Andersen, and $200

Allegations, Continued on Page 39.

EIS Evaluation Raises Questions

by Victoria Raun

Figures and methods used by the Navy in a study on homeporting two more nuclear-powered aircraft carriers at North Island are sketchy and often not verifyible, several experts told city council members, Oct. 20.

The city hired experts in different fields to evaluate the draft environmental impact statement prepared by the Navy; RECON, a San Diego environmental consulting firm, studied the noise and air pollution claims; Parsons, a transportation consulting firm also based in San Diego, the traffic and parking issues; and Joel L. Cehn, reviewed the effects of radiation exposure.

Each consultant also provided written reports to the city.

"I tried to replicate the information given in the EIS," said Cehn. He said he wanted better information from the Navy on the exposure risks resulting from a possible spill of radioactive liquid into the bay.

Councilmember Bruce Williams noted, "The Navy previously informally told us there was no way to monitor" accidental nuclear emissions. "Now we find a network of 44 such stations funded by the Department of Energy." City Manager Homer Bludau suggested that if Coronado needs a monitoring system, "it's the Navy's responsibility to meet the costs to put it in."

The Navy's traffic analysis was described by Bob Sergeant of Parsons Engineering Group as "sketchy at best. It appears to be based on a study done in 1994-95." He said the traffic analysis was also "different from the way we typically do an EIS." Among other faults, the study did not address the long-term, culminative growth of small projects at North Island, he said. The Navy also used technical analysis methods that have been replaced by newer methods.

"I feel there's a lot of material the Navy should provide," he said.

Charles Bull of Recon said, "there is a big absence of information" in the EIS regarding the noise issues. "There is insufficient data to

EIS, Continued on Page 32.

Picasso To Be Auctioned At CSF Dinner

Jill Hardman, and Art & Frames by Wood Gallery have once again generously donated a signed Picasso to the Coronado Schools' Foundation's annual Dinner Auction. This year's donation features "Le Bouquet," one of Picasso's most recognized pieces created in 1958. This French Peace Party Edition (Combat Pour La Paix Parisi) has become an international symbol of peace. The color-lithograph is 19 1/2 X 25 1/2 inches, signed by the artist, and is exquisitely framed by Coronado's own, Jill Hardman. This art treasure is on display in the window of Art and Frames at 936 Orange Ave. until Saturday, Nov. 7, when it will be transported to the Commodore Ballroom of the Loews Coronado Bay Resort for the auction festivities. Please call the CSF office at 437-8059 if you are interested in submitting a sealed bid or in getting more information about the dinner which benefits all the students enrolled in Village Elementary, Strand Elementary, Coronado Middle School and Coronado High School.

CoSA Foundation Hosts Fundraiser At Peohe's Restaurant

The Coronado School of the Arts Foundation (CoSAF) hosted its first fundraiser of the year at Peohe's on Wednesday, Oct. 14. CoSAF, a non-profit organization whose membership includes parents and community members, was formed for the sole purpose of raising money for the Coronado School of the Arts (CoSA).

Roger Boomer, General Manager of Peohe's, and Maureen Flanagan, Peohe's Director of Sales and Marketing, worked closely with Pia Lincoln, CoSAF member who chaired the event; Kris McClung, Director of CoSA; and Anne Friddle, CoSA Administrative Assistant.

Roger Boomer attended last year's CoSA Musical Theatre production of Little Shop of Horrors. He was impressed with the show and the quality of the CoSA program and wanted to help CoSA in its fundraising efforts. He suggested to Dr. Jeffrey Davis, Coronado High School principal, that Peohe's would be a perfect venue for a dinner fundraising event to benefit the Coronado School of the Arts. The Foundation was thrilled with the idea, and the rest is history.

Peohe's prepared some of their most famous dishes including prime rib, Peohe's salad, Chicken Satay, coconut crunchy shrimp, and several delectable desserts.

Guests purchased their tickets through CoSAF which entitled them to a Patron of the Arts membership and an all-you-can-

CoSA, Continued on Page 16.



CoSA visual artists create on "on-the-spot" interpretation of the fundraising event held at Peohe's Restaurant.

Exhibit No. 3
For Identification
Ms. Smith
Date 10-28-98
Manlee Jeffries

Ex 4 page 1 & page 4 EIS

EIS,

Continued from Page 1.

completely compare their (the Navy's) calculations on air quality impact, said David Gottfredson, an environmental analyst completely compare their (the Navy's) calculations on air quality impact, said David Gottfredson, an environmental analyst also with Recon.

Written reports from the experts are included in the council agenda package and are available for public review at the Coronado Public Library and City Hall.

The experts will continue to develop information on the issue, and report back to the council.

Members of the public also shared their concerns with the EIS.

Laura Hunter of the Environmental Health Coalition said that an expert in epidemiology at the University of North Carolina indicated to her that new evidence of the effects of exposure to radiation from the Three Mile Island disaster was not included in the EIS. Also not included were reports of increased incidents of leukemia near the Pilgrim Power Plant.

"An obvious obligation has not been meet" by the Navy to provide accurate information said Betsy Gill of Coronado.

"I don't think the Navy did an accurate worst case analysis," said Marilyn Field, who lives on First Street. She said the Navy should pay the costs of monitoring and the city should develop an disaster plan and consider stockpiling potassium iodine, which has been shown to mitigate the some effects of radiation exposure.

Public hearings on the homeporting issue will be held Tuesday, Oct. 27 at 7 pm at Village Elementary and Wednesday, Oct. 28 at 7 pm at the County Administration Building on Pacific Highway.

H.2

San Diego County Residents Opposed to the Nuclear Megaport and Supporting Testimony of Environmental Health Coalition and Peace Resource Center

San Diego

Ann H. Steinbach
Martha Fort
Marian McGuire
Jim Guerin
Dash Bond
Paul Bond
Lori Judei
Alex Amparan
Amber Eich
Ricky Legaspi
Laurie Stoff
Marcelo Estrada
Joyce A. Waynert
Sue Cambell
Christen Condry
Matt McNaught
Denny Mayeda
Bene Ross
Mattew Schrader
Kathleen Bently
Jason Lacey
John Warner
Pamela Higgins
Scott Milton
Michelle Ruth
Evan Silberstein
Duane Glass
George Ryan
Johathon Berman
Todd Peterson
Keith Black
Catherine Lovelace
Muriel Foster
Kenneth Foster
Miriam Sherrard
William Sherrard
Mariana Lopez
Sandra Bacon
Shawn Young
Stajah Love
Lee Russell
Lucile Goodrich
Gwen Syder
Dorothy Papio
Stephen Carroll
Robin Enns
Deborah Adamos
Pilar Arballo
Michael Harris
Mary Harris
Brian Dyson
Robert Bacon
Randye Hedgecoke
Cyndy Cordle
Efrain Galavre
Marc Camin
Martha Susan Quinn
Kathryn Vargas
Diane Thibodean
Jennifer Coburn
Sheila Gibson
John Benschoter
Primitivo Trujillo
Fran Baily
John Castro
Ashley McGuire
Sarah Severance
Phyllis Gaebelein
D. Selzer
Mick Savage
Merrily Brancaleoni
Janice Janssen
Phyllis Smith
Cindy Harrington-Lee
Celestine de la Victoria
Dan Gilbert
Derek Dixon
Barry Riccio
Kathryn Anthony
Ruthann Shirly
Lewis Shirly
John Maresca
Lisa Smith
Cynthia Guzman
Thomas Herman
Mauriza Kaufman
Ginger Butler
Neelam Amin
Brittany Kunz
Laura Haislip
Patricia Collins
Barbara Stanley
Erika Eberman
Brett Fogacci
Stephen Shirley
Bruce Hart
Marilyn Taylor
Kathryn Wild
Ron Moya
Eric Bowlby
Lydia Tena
Julie Mory
Leonard Blake
Catherine Strohlien
Alfred Strohlien
Paula Mach
Paul Deklecrmaeker
Nola Lamkin
Eddie Bufkin
Bobbi Beer
Cesar Gaeta
Jennie Ankney
Ann Braswell
Marie Haas
Etta Linton
Diane Ake
Julianne de Santi
Carlos Castro Velarde
Rosa Ma Angeles
Beatriz Santana-Hernandez
Amelia Pena
Chiva Arostigue
Julio A. Galindo
Griseldo Galindo
Veronica Martinez
Michael Matsuda
Dora Morales
Dolores Acosta
Zeuaida Lopez
Mirna Rivas
Julia Aluna
Ana Herrera
Christina DeBartolo
Alicia Contreas
Eladia Andrew
Martha Castro
Angelica Velazquez
Patricia Cervantes
Maria Elena Macedo
Eugenia Guadarrama
Elsa Garcia
Francisca Mena
Paula Zapata
Beatriz Velarde

Exhibit No. 5
For Identification
M. Cassidy
Date 10-28-98
Marlee Jeffries

San Diego Cont.

Maria Suarez
Irma Villegas
Mirna V. Pelayo
Isabel Agulera
Sophia Chavez
Maria Sanchez
Leonie Holmquist
Jennifer Wong
Sandra Rodriguez
Moctezuma Rodriguez
Lourdes Moreno
Julia Olvera
Dulce Twist
Samuel Ingersoll-Weng
Muriel Jencks
Nico Calavita
Brian Coit
Gene Vicino
Dean Dickau
Joseph Wainio
Lambert Devoe

Kimberly Ann Groulx
Gwyn Cadenboad
Shaneen Coffey
Gary Cagle
Bonnie Graf
Elaine Moser
Rachel Oberlaner
Mary Gwynne Schmidt
Janice Jorden
Irv Hosenpud
Bob Polucca
Debra Allen
Laurel Ehrenfreund
Craig Gieger
Jean Bruce
Heanne Campbell
Tricsha Frank
Bob Howarth
Earl Johnson
Irene Laurence
Lena Hartz
David McCain
Rolf Schulze
Dan Thomsky

Elfida Miramontes
Veronica Gonzalez
Leonor Miramontes
Mayra Zamora
Benjamin H. Aguilcer Castillo
Luz Garcia
Edith Rogge
Delphine Cain
Sonia Rodriguez
Elvia Villegas
Jamal Adam
Carol Wayman
Megan Costello
Ed Hom
Dr. Clinton Jenks
Leon Ray
Antonio Perez
Irma Cota
Cynthia Jensen-Elliot
Aimee Lee Cheek
Daniel Devoe

Adam Aguilera
Seamus Hefferman
Kevin Noonan
Joy de la Cruz
Stephanie Jennings
Ernie Moser
Michael Oberlander
Dolores Thompson
Allen McAfee
Ernie McCray
Leon Ray
Margy Brookes
Steven Giesing
Giza Braun
Alba Urbina
Marcia Boruta
Jay Whaley

Irene Laurence
Dan Liewer
Dick Martin

Marth Morales
Rebecca Ariaz
Jose Miranmontes
Maria Eleno Mendino
Silvino Rodriquez
Ana Narvarro
Renee Von Bradford
Ximeno Lillo
Carolina Rodriguez
Francisca Jimenez

Nelly Agbayani
Margaret Veltre
Laura Principato
Audrey dela Houssaye
Everado Aguilar
William Alverson
Patrick McGinnis
Francis Minor
Violet A. Devoe
Jose Molina

Heather Rook
Scott Arnston
Jeff Fryar
Jerry Goldberg
Brett Jennings
Charles Nelson
Pam Rider
Connie Unger
Anita Hosenpud
Luis Morones
Jane Carney-Schulze
Nigel Brookes
Ellen Ramsdale
Frederico Lanaza

Barrio Logan/ Logan Heights. San Diego

Maria Elena Molina
Amalia Espiroza
Micaela Martinez
Jose Luis Valles
Ana Martinez
Lidia Hernandez
Pedro Figueroa
Luis Gonzalez
Roberto Cruz
Ramona Montero
Michael Martinez
Irma Villegas
Maria Oaxaca
Francisco Estrada
Martha Corona
Fabian Carbajal Rodriguez
Alma Munoz
Mirna Pelayo
David Hernandez
Daniela Barrera
Abraham Palomino
Filedolfo Reyes
Martha Cortes
Ismael Bautista
Angelica Torres
Maribel Sadoval
Nicolas Bermudez
Rosa Neli Martinez
Luana Rojas
Refugio Mares
Dora Luz Mendoza
Elena Gonzalez
Guadalupe Orozco
Josephine Cruz
Maria Hernandez
Guadalupe Miranda
Juan Carols Vellegas
Genoveva Jaunequi
Emilia Estrada
Antonia Labra

Leonor Pina
Cynthia Hernandez
Sandra Rodriguez
Ester Garcia
Isabel Castro
Jose Molina
Rebeca Gonzalez
Stephanie Olera
Francisco Guillen
Armida Diaz
Hector Villegas
Rosa Guillen
Guadalupe Sanchez
Sonia Rodriguez
Raul Jaquez
Maria Osorio
Silvia Mendoza
Maria Hernandez
Lizeth Villalobos
Silvia Palomino
Luz Palomino
Carolyn Horsley
Elfega Ocampo
Susana Pamus
Jose Torres
Alejandro Galindez
Mariana Bermudez
Rosario Jazo

Laura Rosales Molina
Maria Madrigal
Rosa Arcchiga
Christina Bautista
Lina Ledezma
Guadalupe Hernandez
Sara Gonzales
Estefany Garcia
Veronica Martinez
Josefina Romero

Hilaria Penuelas
Cynthia Palacios
Hoa Le
Maria Gonzlez
Agustin Salgado
Valeria Aceves
Elda Gonzalez
Myrna Lisboa
Sandra Boldern
Cecilia Randel
Hector Islas
Silvia Hernandez
Maria Flores
Jesus Lozano
Radahi Martinez
Elvia Lopez
Teresa Duran
Marth Bolanos
Janeth Murillo
Silviano Palomino
Joaquin Galau
Omar Lopez
Araceli Perez
Jaime Brandes
Maria dela Sancna
Ofelia Brandes
Erendira Galindez
Eserannza Ledon
Reyna Perez

Sherman Heights

Maria Esquer
Angeles Valasques
Rosario Miguel
Irene Vega
Maria Sanchez
Alfredo Sanchez
Carmen Armenta
Angelica Angeles Guerrero

Chula Vista

Terry Thomas
Holly Parker
Leticia Ayala
Jovita Ayala
Juan Ayala
David Neptune
Barbara Barajas
Maria Manuela Sanchez

Imperial Beach

Joey Randolph
Sonia Quintana
Kaia Haines
Danielle Sodi

Maria Nava
Maria Rosales
Guadalupe Echeverria
Leticia Velardez
Carmen Lopez
Violeta Flores
Cecilia Medina
Elvia Espinoza
Miguel A. Rodriguez
Teresa Marrujo
Mercedes Ramos
Candelorea Lopez

Bonita

Margarita Garcia
Molly Gassaway
Rebecca Del Torra
The Uribe Family
Eugene Robledo
Steve Gassaway

National City

Marciela Yuriar
Ernestina Rona
Leticia Dickernoff
Leticia Sanchez
Chaya Lopez
Maribel Meza
Alma Ramon
Maria Arredondo
Yolanda Garduno
Piedad Aguilar

Coronado

Martha Kiss
Story Vogel
Joe Simpson
Betty Coady
Nancy Ellen Daniels
Jane Alsup
Fred Lorenzen
Joyce Logsden
John Deans
Betty Ansel
Frances Bassett
Lisa Carter
Marilyn Crehore
Jeffrey Davidson
Grace Harrington
Elinor Lindberg
Dixie McCarthy
Nancy McRae
Lynda Ollerton
Susan Ronan
Don Valliere
Betty Tappan

Barbara Denny
Joan Adessa
Elizabeth Panetery
Matthew O'Grady
Lee Jennings
Ardis Weise
Lou Georgino
William Logsden
Stephanie Kaup
Harold Ansel
Jaqueline Benson
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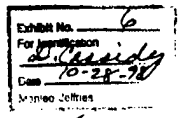
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San Diego Hearing

H.2.1 Your comments are noted and are included in the Final EIS.

H.2.2 Your comments are noted and are included in the Final EIS.

H.2.3 Section 1.1 of the EIS discusses the process of public participation required under NEPA. The Navy will use this EIS, including the public's comments on the Draft EIS, in conjunction with other relevant materials, in making their decision regarding the homeporting of the three CVNs in the Pacific Fleet currently under consideration.

H.2.4 NNPP-related comments in this testimony are also made in the EHC's letter, O.12. Please see the Navy responses to these comments.

H.2.5 The comment addresses the process the Navy has used to make decisions regarding the homeporting of CVNs in the Pacific Fleet. The sequence of events affecting the decisions to home port CVNs in San Diego, and the chronology of CVN homeporting, along with the decommissioning of CVs in the Pacific Fleet, is discussed in detail in response to comment L.4.5. The Navy had not, at the time of preparation of the 1995 EIS for the BRAC CVN, formulated a proposal for how to meet the need of facilities for two more CVNs in the Pacific Fleet. However, the Navy did anticipate that in the future, a proposal would be formulated, and that the alternatives could include facilities at NASNI. Therefore, a larger project was not segmented into two smaller projects for the purpose of avoiding more rigorous environmental analysis. Further, although a "proposal" had not been formulated such that it could be analyzed on a "co-equal" basis in the 1995 EIS, it was reasonably foreseeable that a future project could include additional facilities at NASNI. Since it was reasonably foreseeable, the potential effects were included in the analysis of cumulative effects in that document. The 1995 EIS states, "This EIS, therefore, considers the potential cumulative impacts of CV replacement and homeporting a total of three CVNs in San Diego." See Volume 1 of the 1995 EIS, Chapter 6 (DON 1995a).

H.2.6 Two public hearings on the Draft EIS have been held in the San Diego region and public testimony received, as required under NEPA. The Navy does not currently have plans to have a follow-on community workshop for an informal dialogue. Concerns generated during the public review of the EIS will be considered by Navy personnel responsible for making decisions regarding the proposed action. Navy representatives at the EIS public hearings are directly involved with this decision-making process, and provide recommendations to the Secretary of the Navy regarding the preferred alternative to be implemented.

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Furthermore, the Navy ensures that the EIS decisionmaker has a complete copy of the public hearing transcripts. The Navy believes that the objective sought by the comment is met by the fact that the transcript of the public hearing is prepared and reviewed as part of the NEPA process leading up to the Record of Decision.

The Department of Toxic Substances Control, in an Order Denying Petition For Review of the Environmental Health Coalition, Peace Resource Center of San Diego, and Stephanie Kaupp's challenge to the permitting of the Mixed Waste Storage Facility at NASNI (ID No. CAR 000 019 430; Docket HWCA 98/99 – P012), responded to this issue with the following:

> Petitioners are incorrect in their assertion that members of the public have a "right" to speak directly to the decision-maker (i.e., that the Department official that signs the Permit must also be the hearing officer). Nevertheless, the Department ensures that the official who signs the Permit has a complete transcript of the public hearing for review. The Department believes that the objective sought by Petitioners is met by the fact that a transcript of the public hearing is prepared and reviewed as part of the final permit decisionmaking process. Furthermore, there is not basis to believe that the permit decision or conditions would be altered if the hearing officer for the public hearing also signed the Permit itself.

H.2.7 Please see response to comment O.10.23.

H.2.8 Please see response to comment H.2.6.

H.2.9 Your comments are noted and are included in the Final EIS.

H.2.10 Construction of the Depot Maintenance Facility was covered in the Navy's 1995 Final Environmental Impact Statement for the Development of Facilities in San Diego/Coronado to Support the Homeporting of One NIMITZ-Class Aircraft Carrier. However, it is important to note that all aspects of facilities design, construction, and modification conform to national and local regulatory codes, which include distance limits for siting from an earthquake fault. The design of the facility follows conservative methods widely accepted by the engineering community and provides additional "factors of safety" in redundant structural design features. For radiological facilities, the Naval Nuclear Propulsion Program uses standard design features that have been developed to minimize potential risk to the environment, to the general public, and to workers. Stringent design criteria comply with all building codes, including those applicable to earthquakes. During construction, "state-of-the-art" construction techniques along with rigorous field observation and inspection are used where

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appropriate to ensure a solid and competent foundation under all credible seismic loading conditions.

Also, contrary to the commentor's assertion, the Navy is not proposing to make North Island a nuclear waste disposal facility. As was described in the response to O.12.69, low-level radioactive waste will be shipped to off-site treatment and disposal facilities as soon as practicable, with consideration given to minimizing the number of truck shipments and the availability of those facilities. The Navy does not dispose of it low-level radioactive waste at its facilities.

H.2.11 Please see response to comment O.12.216.

H.2.12 Please see responses to comments O.12.86 and O.12.44.

H.2.13 Please see responses to comments L.4.47 and L.4.36.

H.2.14 Your comments are noted and are included in the Final EIS.

H.2.15 Although no specific issues were noted by the commentor, the Navy notes the commentor's general opinion regarding the proposed action.

H.2.16 Please see responses to comments L.4.34, O.12.25, and O.12.190.

H.2.17 Your comments are responded to in this Final EIS (see above responses).

H.2.18 The Navy does not consider that translation of the Draft EIS into Spanish is required to ensure that low income and minority populations have the opportunity to fully participate in the NEPA process. A scoping meeting to discuss the issues to be addressed in the EIS was held in Coronado on 10 February 1998. Since that time, the Navy has acknowledged the necessity of including a public hearing in San Diego. Notices of availability for the Draft EIS were placed in *La Prensa*. All responses to public comments generated during the public comment period provided in Spanish are translated into Spanish. The comments are annotated to ensure that the reader has sufficient understanding of the EIS materials without needing to read the EIS itself. The Notice of Availability (NOA), is translated in Spanish, and a telephone 888 support hot line is available in Spanish as well.

La Marina de los Estados Unidos no considera que la traducción al español del Draft EIS (Estudio de Impacto al Medio Ambiente) es requerida para asegurar que la población de bajos recursos y las minorías tengan la oportunidad de participar totalmente en el proceso conocido como NEPA. Una reunión para analizar los temas que serían tratados en el EIS (Estudio de Impacto al Medio Ambiente) se llevó a cabo en Coronado el 10 de febrero de 1998. Desde aquel momento, la Marina de los Estados Unidos ha reconocido la necesidad de incluir al público en la reunión de San Diego. Los avisos de

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disponibilidad para el Draft EIS (Estudio de Impacto al Medio Ambiente) fueron publicados en La Prensa . Todas las respuestas a los comentarios públicos generados durante el período de comentarios públicos que fueron provistos en español son traducidos al inglés. Los comentarios son anotados para asegurar que el lector tenga un entendimiento suficiente de los materiales del EIS (Estudio de Impacto al Medio Ambiente) sin la necesidad de tener que leerlo en su totalidad. El Aviso de Disponibilidad (NOA), está traducido al español y hay una línea telefónica 888 que también está disponible en español.

H.2.19 The air quality analysis in the Draft EIS is based on compliance with national and state ambient air quality standards. These standards represent allowable atmospheric concentrations at which the public health and welfare are protected and include a reasonable margin of safety to protect the more sensitive individuals in the population, such as elderly people and children. Since the proposed action alternatives would not exceed any ambient air quality standard, public health would be protected from the effects of the proposed action alternatives. Toxic air contaminants (TACs) emissions from the proposed dredging and disposal actions at NASNI would produce insignificant health impacts to the public.

Cumulative impacts from past projects that affect local air quality and toxic waste emissions were taken into account in this EIS. This EIS presents data that concludes there would be no significant impacts to the fish community from the proposed action. Fish would avoid dredge areas, so they would likely not be affected by any contaminants resuspended during dredging.

El análisis de la calidad del aire en el Draft EIS (Estudio de Impacto al Medio Ambiente) está basado en el cumplimiento con las normas de la calidad del aire ambiental nacional y estatal. Estas normas representan las concentraciones atmosféricas permisibles en las cuales el bienestar y la salud pública están protegidas e incluye un margen razonable de seguridad para proteger los individuos más sensibles dentro de la población, tales como las personas mayores y los niños. Como las acciones alternativas propuestas no excederían ninguna norma de la calidad del aire ambiental, la salud pública estaría protegida de los efectos de las acciones alternativas propuestas. Las emisiones de los contaminantes toxicós del aire (TAC) causadas por el dragado propuesto y por las acciones de deshecho en NASNI, producirían un impacto insignificante en la salud pública.

Los impactos cumulativos de proyectos pasados que afectan la calidad del aire local y las emisiones de residuos tóxicos, fueron tomados en cuenta en este EIS (Estudio de Impacto al Medio Ambiente). Este EIS (Estudio de Impacto al Medio Ambiente) presenta datos que concluyen que no habría impactos significativos en la vida marina debido a la acción propuesta. Los peces evitarían las áreas de dragado, así que probablemente no serían afectados por ninguno de los contaminantes en suspenso después del dragado.

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H.2.20 Purchases of local shipbuilding companies by other defense contractors, and the fact that these defense contractors are pursuing bids on ship repair, are common business practice and are beyond the scope of this EIS. The fact that defense contractors may be qualified to perform NNPP radiological work does not imply that NNPP radiological work would be performed: (1) in locations other than the NASNI CIF or (2) in any different manner than the uniform standards established by the NNPP. The purchases would not affect the amount of maintenance performed on homeported CVNs.

Pollution impacts of the Navy's action to homeport USS JOHN C. STENNIS at NASNI were addressed in the Navy's 1995 Final Environmental Impact Statement for the Development of Facilities in San Diego/Coronado to Support the Homeporting of One NIMITZ-Class Aircraft Carrier. Please see response to comment H.2.19a for a discussion of air quality impacts in this EIS.

The EIS has evaluated a wide variety of accidents and has determined that the radiological risks are not significant. No vessels would be constructed as part of the proposed action. The CVNs homeported there would receive maintenance at the facility at NASNI, with out-of-water maintenance, the Docking Planned Incremental Availability (DPIA) occurring once every 6 years at PSNS, in Bremerton, Washington. Hazardous material use and storage would occur at NASNI consistent with existing practices. Adequate hazardous waste capacity exists to accommodate material generated by the capacity to homeport two additional CVNs. No impact to neighborhoods outside of NASNI would occur.

Las compras de compañías locales de astilleros por otros contratistas de defensa, y el hecho que estos contratistas de defensa están llevando a cabo licitaciones para reparaciones de buques, son un práctica comercial común y están más allá del alcance de este EIS (Estudio de Impacto al Medio Ambiente). El hecho que los contratistas de defensa puedan estar capacitados para desempeñar trabajos radiológicos NNPP no implica que el trabajo radiológico NNPP pueda ser desempeñando: (1) en otras ubicaciones aparte de la NASNI CIF o (2) en alguna manera diferente que los estándares uniformes establecidos por el NNPP. Las compras no afectarían la cantidad de mantenimiento llevada a cabo en los CVN que están en el puerto base.

Los impactos de contaminación de la acción de la Marina al USS JOHN C. STENNIS en el puerto base en NASNI fueron tratados en 1995 en la Declaración Final de Impacto Medio Ambiental para el Desarrollo de Instalaciones en San Diego / Coronado para el Soporte de Puerto Base de un Portaaviones Clase NIMITZ. Por favor véase la respuesta al comentario H.2.19 a para la discusión sobre el impacto a la calidad del aire en este EIS (Estudio de Impacto al Medio Ambiente).

El EIS (Estudio de Impacto al Medio Ambiente) ha evaluado una amplia variedad de accidentes y ha determinado que los riesgos radiológicos no son significativos. Ningún buque será construido como parte de la acción propuesta. Los CVN's en el puerto base

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recibirán mantenimiento en la instalación en NASNI, con mantenimiento en seco, con la Disponibilidad Incrementada de Atraco Planeado (DPIA) ocurriendo una vez cada seis años en PSNS, en Bremerton, Washington. El uso y el almacenaje de materiales peligrosos ocurriría en NASNI, consistente con las prácticas actuales. Existen capacidades adecuadas para materiales peligrosos para acomodar el material generado por la capacidad de tener dos adicionales CVN's en el puerto base. No ocurrirán impactos a los vecindarios afuera de NASNI.

H.2.21 A wide range of hypothetical accidents was considered in the development of the analysis presented in the EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

En el desarrollo de los análisis presentados en el EIS (Estudio de Impacto al Medio Ambiente) se consideraron una amplia diversidad de accidentes hipotéticos. Los resultados de todos los análisis, tanto de operaciones normales como de accidentes hipotéticos indican que no habrán impactos radiológicos significantes por el puerto base y mantenimiento de portaaviones clase NIMITZ, ni por la operación de instalaciones de mantenimiento de portaaviones clase NIMITZ.

H.2.22 The Navy's plan for emergency response is included in section 7.5 of the EIS. The EIS states that emergency planning and emergency response is included as an integral part of ongoing NNPP operations to ensure the Navy is prepared to handle accidental releases of radioactivity. In the highly unlikely event of an emergency, the Navy would promptly notify State and local officials, and would communicate with those officials. Any action needed to protect the public would be handled by State and local officials using existing plans for emergencies from natural events, such as earthquakes or hurricanes. In addition, it is important to note that since the inception of the NNPP almost half a century ago, there has never been a reactor accident associated with the Program, which has accumulated over 5,000 reactor years of operation. In addition, there has never been any release of radioactivity that has had a significant effect on the public or the environment. The Navy's historical record of safe and responsible operation of nuclear powered warships is discussed in Volume I, Chapter 7 of the EIS.

H.2.23 Two public hearings on the Draft EIS have been held in the San Diego region and public testimony received, as required under NEPA. The Navy does not currently have plans to have a follow-on community workshop for an informal dialogue. Concerns generated during the public review of the EIS will be considered by Navy personnel responsible for making decisions regarding the proposed action. Navy representatives at the EIS public hearings are directly involved with this decision-making process, and provide recommendations to the Secretary of the Navy regarding the preferred alternative to be implemented.

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Furthermore, the Navy ensures that the EIS decisionmaker has a complete copy of the public hearing transcripts. The Navy believes that the objective sought by the comment is met by the fact that the transcript of the public hearing is prepared and reviewed as part of the NEPA process leading up to the Record of Decision.

H.2.24 Please see responses to comments L.4.48, O.12.78, and O.12.190 regarding issues raised in this comment.

H.2.25 Information on low-level radiation exposure and risk are addressed in Appendices E and F of the EIS and in response O.12.190. Non-cancer risks are addressed in comment O.12.27.

H.2.26 The Navy is aware of two studies that specifically address alpha and beta radioactivity in San Diego Bay. The first is the San Diego Bay Health Risk Study, which is described in response O.12.127. The second is a study chartered by the San Diego Association of Governments. The SANDAG 205(J) study included efforts to characterize the levels of total alpha and beta radiation in bottom sediments throughout the bay, but outside of the Naval restricted areas. The results of this study (San Diego Bay Cleanup Project Under Section 205(J) of the Clean Water Act, January 1992) identified that all radioactivity levels were evaluated to be at background levels by the California Department of Health Services. Since the predominant radionuclide associated with NNPP work is cobalt 60, which emits gamma radioactivity, it is impossible to conclude that NNPP work is the source of the radioactivity detected based solely on gross alpha and beta activity.

Extensive Navy radiological monitoring in the San Diego Bay area, performed quarterly and publicly reported annually for 30 years by the Navy, and independent radiological surveys performed by EPA in 1967, 1986, and 1997, discovered no radioactivity associated with nuclear propulsion in any Bay aquatic life.

H.2.27 The EIS concludes that there are no significant impacts to the public's health and safety (please see sections 3.15 (Volume 1), and Appendix E, Appendix F, and Appendix J in Volume 2.

H.2.28 Notwithstanding the GAO analysis, the Defense Acquisitions Board (DAB) decided in September 1998 that CVX would be nuclear powered. This decision was based on a careful analysis of all pertinent data including the Department of the Navy's evaluation of tactical flexibility, operational and technical risks, and funding requirements of the various alternatives. For further detail, please see the response to comment H.1.5.

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H.2.29	Please see responses to comments O.12.55 and I.80.2.
H.2.30	Please see responses to comments O.12.55 and I.80.2.
H.2.31	Please see responses to comments O.12.55 and I.80.2.
H.2.32	Please see responses to comments O.12.55 and I.80.2.
H.2.33	Please see responses to comments O.12.55 and I.80.2.
H.2.34	Please see responses to comments O.12.55 and I.80.2.
H.2.35	Your comments are noted and are included in the Final EIS. Please see the response to comment H.1.5 above. Please see responses to comments O.12.55 and I.80.2.
H.2.36	Please see responses to comments O.12.55 and I.80.2.
H.2.37	Your comments are noted and are included in the Final EIS.
H.2.38	A chronology of events resulting in the potential replacements for aircraft carriers planned for decommissioning in the San Diego area is provided to help the reader understand how NASNI has customarily been home port for three aircraft carriers. In the 1980s, the Navy reduced the size of its active aircraft carriers from 15 to 12: six in the Atlantic Fleet and six in the Pacific Fleet. Before that time, NASNI had been the homeport for at least three aircraft carriers. In the early 1970s, this included USS TICONDEROGA, USS KITTY HAWK, and USS CONSTELLATION; in the mid-1970s, USS RANGER, KITTY HAWK, and CONSTELLATION; throughout the 1980s, RANGER, KITTY HAWK, and CONSTELLATION; and in the early 1990s, a combination of USS INDEPENDENCE, (while KITTY HAWK and/or CONSTELLATION were undergoing their Service Life Extension effort in Philadelphia, Pennsylvania), KITTY HAWK, CONSTELLATION, and RANGER. All ships listed above are or were conventionally powered carriers, or "CVs." In 1993, RANGER was decommissioned at the end of its service life and removed from NASNI, temporarily reducing the port-loading to two CVs. The closure of Naval Air Station (NAS) Alameda, California, and the relocation of two CVNs to fleet concentrations in San Diego and the Pacific Northwest were carried out in compliance with the 1993 Defense Base Realignment and Closure Commission (BRAC) recommendations. Consequently, the Department of the Navy constructed homeporting facilities for one CVN at NASNI (DON 1995a)

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and one at Puget Sound Naval Shipyard (PSNS), Bremerton, Washington (DON 1995b). Because there were no CVN homeport-capable berths at NASNI, the Navy was allowed to shift both NAS Alameda CVNs to the Pacific Northwest, pending completion of construction of suitable homeport facilities at NASNI. Those facilities were the subject of an EIS entitled *Environmental Impact Statement for the Development of Facilities in San Diego to Support the Homeporting of One NIMITZ Class Aircraft Carrier* (DON 1995a). The actual vessel that fulfilled the BRAC mandate and assumed the role of RANGER was USS JOHN C. STENNIS (CVN-74). Arriving in August 1998, STENNIS took over one CVs worth of facility support infrastructure at NASNI. NASNI has had the historical capacity to support three aircraft carriers.

The environmental analysis in an EIS correlates to the level of planning for a particular project. If the planning has evolved such that the agency has formulated a project to meet a particular need, the EIS should reflect analysis of all aspects of that project, and the alternative methods of meeting the identified need should be addressed on a "co-equal" basis. In this case, the Navy had not, at the time of preparation of the 1995 EIS, formulated a proposal for how to meet the need of facilities for two more CVNs in the Pacific Fleet.

However, the Navy did anticipate that in the future, a proposal would be formulated, and that the alternatives could include facilities at NASNI. Therefore, a larger project was not segmented into two smaller projects for the purpose of avoiding more rigorous environmental analysis. Further, although a "proposal" had not been formulated such that it could be analyzed on a "co-equal" basis in the 1995 EIS, it was reasonably foreseeable that a future project could include additional facilities at NASNI. Since it was reasonably foreseeable, the potential effects were included in the analysis of cumulative effects in that document. The 1995 EIS states, "This EIS, therefore, considers the potential cumulative impacts of CV replacement and homeporting a total of three CVNs in San Diego." See the 1995 EIS, Volume 1, Chapter 6 (DON 1995a).

The U.S. District Court for the Southern District of California approved the Navy's implementation of NEPA, and concluded that the Navy had not understated the potential effects of a larger project by preparation of two documents (segmentation). In an Order dated May 12, 1997, the Court stated, "Because the Court finds that no proposal to homeport three CVNs existed prior to the issuance of the Final EIS, the Final EIS's analysis of the possible cumulative impacts of potential additional home ports suffices under NEPA."

In 1998, INDEPENDENCE (at that time the Navy's "forward deployed" carrier) reached the end of its service life and was decommissioned. KITTY HAWK was designated as its replacement and left NASNI in July 1998, 20 months after the Notice of Intent for this EIS, and relocated to Yokosuka, Japan. This resulted in a

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reduction of the port loading at NASNI to two homeported aircraft carriers. The USS NIMITZ is currently undergoing an extended maintenance period on the East Coast and will require a homeport berth within the Pacific Fleet area. Long range plans indicate that the most likely arrival date on the West Coast for NIMITZ would be early 2002. *Were the Preferred Alternative selected,* this would bring NASNI back to its historical three carrier port-loading baseline.

USS CONSTELLATION is expected to reach the end of its service life in approximately 2003. At that time, NASNI would once again experience a reduction to two homeported carriers *if the Preferred Alternative were selected by the Navy.* The same long range plans addressing NIMITZ also involve replacing CONSTELLATION with the USS RONALD REAGAN. It is anticipated this will happen in 2005. Once again, *if the Preferred Alternative were selected,* it would bring NASNI back to its historical three carrier port-loading baseline.

H.2.39 As mentioned in the response to comment O.12.104, TAC emissions from the proposed dredging and disposal actions at NASNI would produce insignificant health impacts to the public. As stated in the response to comment O.12.136, the cumulative impact of toxic emissions from the proposed dredging and disposal activities and existing operations at NASNI would be insignificant. It is possible that the staggered maintenance schedules of CVNs homeported at NASNI could occasionally result in more than one PIA in a calendar year. However, the NASNI DMF would limit annual emissions of VOC and PM_{10} to 15 and 3 tons, respectively. Therefore, performance of 2 PIAs per year at NASNI would not exceed these emission levels. As part of the SDCAPCD permit process, TAC emissions from the DMF were evaluated at their maximum annual permitted rate and were determined to produce insignificant health risks to the public. Therefore, compliance with the SDCAPCD permit conditions would ensure that with the addition of two CVNs at NASNI, the health risk to the public from the DMF would remain insignificant.

Since the completion of most recent health risk assessment for NASNI in 1993, emissions of HAPs have decreased from the facility, especially in regard to the reduction of hexavalent chromium from painting operations. As a result, the public health risk from NASNI has decreased since 1993.

Section 3.10, Volume 3 of the Final EIS has been revised to include the most recent toxic air contaminants (TAC) emissions inventory for operations at NASNI.

H.2.40 There will be no increase in the amount or frequency of aircraft arriving at or departing from NASNI as a result of providing capacity for two additional CVNs. The air wing on a CVN is the same size and composition as an air wing

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on a CV. No additional aircraft maintenance will be performed at NASNI as a result of this action.

There will be no additional impacts to the affected environment due to training conducted in SOCAL by the CVN air wing. The training a CVN air wing does is exactly the same as the air wing of a CV. There is no net increase in the number of aircraft carriers at NASNI. The proposed action would only create the capacity to homeport two additional CVNs.. Please refer to Volume 1, paragraph 1.1.

H.2.41 The Navy complied with all applicable regulations in the preparation of the Draft EIS. Therefore the Navy, as Lead Agency, disagrees that the document is deficient in meeting NEPA requirements. The Final EIS has been revised to provide minor clarification in a number of areas in response to public comment. Responses to comments include evaluation of recent traffic and noise data presented by the City or Coronado. Evaluations of these data verify that the environmental effects of the proposed action were assessed correctly in the Draft EIS. Please see responses to comments H.2.53 (traffic) and L.4.29 (noise).

H.2.42 Your comments are noted and are included in the Final EIS.

H.2.43 Your comments are noted and are included in the Final EIS.

H.2.44 Your comments are noted and are included in the Final EIS.

H.2.45 Your comments are noted and are included in the Final EIS.

H.2.46 Your comments are noted and are included in the Final EIS.

H.2.47 Your comments are beyond the scope of this EIS.

H.2.48 Please see response to comment O.12.72.

H.2.49 Your comments are beyond the scope of this EIS.

H.2.50 The chronology of CVN homeporting, along with the decommissioning of CVs in the Pacific Fleet, is discussed in detail in response to comment L.4.5. The Navy had not, at the time of preparation of the 1995 EIS for the BRAC CVN, formulated a proposal for how to meet the need of facilities for two more CVNs in the Pacific Fleet. However, the Navy did anticipate that in the future, a proposal would be formulated, and that the alternatives could include facilities at NASNI. Therefore, a larger project was not segmented into two smaller projects for the purpose of avoiding more rigorous environmental analysis. Further, although a "proposal" had not been formulated such that it could be analyzed on a "co-equal" basis in the 1995 EIS, it was reasonably foreseeable that

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a future project could include additional facilities at NASNI. Since it was reasonably foreseeable, the potential effects were included in the analysis of cumulative effects in that document. The 1995 EIS states, "This EIS, therefore, considers the potential cumulative impacts of CV replacement and homeporting a total of three CVNs in San Diego." See the 1995 EIS, Volume 1, Chapter 6 (DON 1995a).

H.2.51 The Navy still has intentions to relocate the NASNI Main Gate to align with Third Street. Relocation of the Third Street gate is a multi-faceted effort that required first the relocation of the NASNI commissary and Navy exchange. Once construction of the new commissary and exchange construction were completed, the old commissary and exchange could be razed, and the Third Street gate could be moved. Until funding was secured to relocate the commissary and exchange, only limited activity associated with the Third Street gate relocation could occur. Funding for relocation of the NASNI commissary and Navy exchange is now available and design for the new commissary/exchange is nearly completed, with construction scheduled to begin in summer or fall of 1999. Steps have been taken to initiate the Third Street gate relocation as an official navy project. Parametric costs have been collected and preliminary design considerations have been formulated. The Navy is committed to continue to seek these funds. Therefore, planning associated with the project continues, but will be subject to congressional approval as a naval budget item. In any event, relocation of the gate could not have proceeded until preliminary activities of commissary and exchange redesign had been completed. This gate relocation project is not needed as mitigation for the proposed CVN homeporting, but is being planned as a measure to improve access to NASNI, reduce traffic congestion, and reduce traffic volumes on First Street (trucks in particular).

H.2.52 The relationship of CVs and replacement CVNs are addressed in response to comment H.2.50. The Navy does not perceive that having three CVNs at NASNI increases the threat from terrorists beyond the potential that has existed for the past several decades. In fact, while the potential for terrorists acts may not have changed, the robustness of a naval vessel designed to withstand combat damage lessens the potential impact that such an act might incur. The very nature of a military assets diminishes its attractiveness as a target for terrorist. Not only is there a constant posture of security maintained through tightly controlled access and roving patrols, but the ability of the trained "targeted personnel" to react with deadly force increases the risk to the terrorist.

H.2.53 The transportation analysis has been revised to incorporate more recent traffic data that were not available to the EIS preparer when the Draft EIS was initially prepared (i.e., the traffic volumes documented in the October 1998 SANDAG report). For example, Table 3.9-1 is revised to show a average annual volume of

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71,000 vehicles per day on the Coronado Bay Bridge. The trip generation rate used in the Draft EIS has been revised to reflect calculations based on 1996 personnel counts (see Table 2-1, Volume 3) and actual gate counts taken during that same year (see Table 3.9-7, Volume 3).

With regard to the use of 1995 traffic data to represent existing conditions, that was considered current for average daily traffic volume information when the EIS traffic analysis was initiated in 1997. Table 3.9-1 has now been revised to represent 1996 and 1997 traffic data. The revised numbers represent the highest traffic volume cited in the various source references. The traffic impact analysis, which was based primarily on the peak hour levels of service at the critical study area intersections, used traffic counts that were taken August of 1996 to represent existing conditions. These counts were taken during a peak summer tourist season when two aircraft carriers were in port.

Unique circumstances such as threats, suicides, and bridge accidents certainly have an effect on traffic conditions on the day of the incident; however, it would not be appropriate to model or analyze such unique circumstances in conjunction with the EIS traffic study.

H.2.54 As the Draft EIS traffic analysis indicates that the proposed action would not have a significant traffic impact. The Navy still has intentions to relocate the NASNI Main Gate to align with Third Street. Relocation of the Third Street gate is a multi-faceted effort that required first the relocation of the NASNI commissary and Navy exchange. Once construction of the new commissary and exchange construction were completed, the old commissary and exchange could be razed, and the Third Street gate could be moved. Until funding was secured to relocate the commissary and exchange, only limited activity associated with the Third Street gate relocation could occur. Funding for relocation of the NASNI commissary and Navy exchange is now available and design for the new commissary/exchange is nearly completed, with construction scheduled to begin in summer or fall of 1999. Steps have been taken to initiate the Third Street gate relocation as an official navy project. Parametric costs have been collected and preliminary design considerations have been formulated. The Navy is committed to continue to seek these funds. Therefore, planning associated with the project continues, but will be subject to congressional approval as a naval budget item. In any event, relocation of the gate could not have proceeded until preliminary activities of commissary and exchange redesign had been completed. This gate relocation project is not needed to mitigate less than significant impacts associated with the proposed CVN homeporting, but is being planned as a measure to improve access to NASNI, reduce traffic congestion, and reduce traffic volumes on First Street (trucks in particular). Although a tunnel between the Coronado Bay Bridge and the NASNI Main Gate would alleviate many of the traffic congestion problems on

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the Coronado streets, such a project is not needed to mitigate less than significant impacts associated with the CVN homeporting project.

H.2.55 Please refer to the responses L.4.44 and I.37.1 to similar questions. NASNI has been a three-carrier homeport for decades; a period in excess of 30 years. The proposed action would only create the capacity to homeport two additional CVNs.

H.2.56 The Navy disagrees with the comment's assessment of the adequacy of the EIS. The Navy complied with all applicable regulations in the preparation of the Draft EIS. Therefore the Navy, as Lead Agency, disagrees that the document is deficient in meeting NEPA requirements. The Final EIS has been revised to provide minor clarification in a number of areas in response to public comment. Homeporting three additional CVNs at NASNI was concluded in section 2.7.1 of the EIS to not be a reasonable alternative to the proposed action. Response to comments include evaluation of recent traffic and noise data presented by the City or Coronado. Evaluation of these data verify that the environmental effects of the proposed action were assessed correctly in the Draft EIS. Please see responses to comments H.2.53 (traffic) and L.4.29 (noise).

H.2.57 The Navy has reviewed the traffic noise data provided in the recently completed "City of Coronado Noise Study — 1998" (RECON October 1998), which was not available at the time the Draft EIS was prepared. The new data have been incorporated into the EIS analysis and the older data from the 1993 noise study have been removed. The new data how that the existing traffic noise situation exceeds the City of Coronado General Plan Noise Element noise standard of 65 dBA. Volume 1, section 3.11.1 and Volume 3, section 3.11 have been revised to incorporate this information. The analysis conclusions for proposed action noise impacts, however, remain unchanged.

H.2.58 The Navy, as Lead Agency, believes that it has complied with all applicable regulations in the preparation of the Draft EIS; therefore, the Navy disagrees that the document is deficient in meeting NEPA requirements. Although Draft EIS comments resulted in minor changes in the analysis, no comment has changed the Navy's original assessment of significant impacts in any environmental category. In absence of significantly changing the results reported in the draft EIS, the Navy believes that a request to recirculate the Draft EIS is unwarranted per 40 CFR 1502.9(a). If the Navy determines that significant new circumstances or information emerges that is relevant to environmental concerns that bear on the proposed action or its impacts, then the Navy shall prepare a supplement to the EIS. Responses to public comments on the Draft EIS have been provided in this Final EIS. In response to some comments, additional information has been added to the text.

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H.2.59	The Navy, as Lead Agency, complied with all applicable regulations in the preparation of the Draft EIS; therefore, the Navy disagrees that the document is deficient in meeting NEPA requirements. Responses to public comments on the Draft EIS have been provided in this Final EIS.
H.2.60	Please refer to the responses L.4.13 and L.4.14.
H.2.61	In regard to PIA maintenance worker commuter vehicles associated with the proposed actions, please see the response to comment L.4.13. Data on California/non-California vehicle registration associated with CV and CVN personnel have been used to revise the commuter vehicle emission calculations for the proposed actions in the Final EIS. Emissions from California and non-California registered vehicles have been estimated with the use of the ARB EMFAC7G and EPA MOBILE5 models.
H.2.62	Fire protection level of service currently meets the requirements specified by the Department of Defense Instruction (DODI) 60.555.5. Adequate fire protection has existed for CVs at NASNI, and will continue to exist for CVNs as well. Adequate fire lanes and equipment exist to combat any shipboard fire at NASNI. Section 3.14.1 of the EIS has been revised to state that sufficient resources at NASNI exist to combat any shipboard fire. For additional detail, see the response to comment O.10.18.
H.2.63	Section 3.3 addresses impacts to water quality from CVN operations, and indicates that best management practices would be implemented by the Navy to minimize the magnitude of any accidental waste discharges to the bay during normal operations. . Section 3.3.2 (page 3.3-9, lines 5-6 of the Draft EIS) will be revised to indicate that BMPs would also be implemented to minimize waste discharges to the bay during maintenance operations. Section 3.3.2 (page 3.3-9, line 32 of the Draft EIS) will be revised to read "All operational discharges, including stormwater runoff, would meet applicable regulations and permit standards." As indicated in the text of the EIS, potential impacts to the Bay associated with storm water runoff have been mitigated to a level of insignificance by components of the project design. Specifically, storm water runoff and associated impacts and mitigation measures have been discussed on pages 3.2-1, 3.2-3, 3.2-4, 3.2-5, 3.2-6, and 3.2-7. Therefore, the text remains unchanged.
H.2.64	Please see response to comment O.10.23.
H.2.65	Please see responses to comments O.13.24 and I.43.13.
H.2.66	Comment noted.

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H.2.67	Your opinions are noted. Regarding your comment about an alleged incident involving spilling paint, it has nothing to do with this EIS or the proposed action.
H.2.68	Please see response to comment O.12.10.
H.2.69	The Navy considers itself to be a part of the community. This EIS identifies the potential environmental effects that the proposed action would have on the local and regional environment as appropriate.
H.2.70	Your comments are beyond the scope of this EIS.
H.2.71	Plutonium is not among the radionuclides released as part of NNPP operations.
H.2.72	Your comments are beyond the scope of this EIS.
H.2.73	Your comments are noted and are included in the Final EIS.
H.2.74	Please see the response to comment H.1.5.
H.2.75	Please see responses to comments O.12.55 and I.56.5.
H.2.76	Please see response to comment H.2.21.
H.2.77	Your comments are noted and are included in the Final EIS.
H.2.78	The USS STENNIS mitigation site was constructed in accordance with permit conditions set forth by the resource agencies. The new wharf mitigation site would also be constructed in accordance with permit conditions and it is proposed that this site would provide like-and-in-kind replacement of intertidal and subtidal habitat at a ratio of 1:1. There would be 1.5 acres filled by construction of the new wharf. The fill would eliminate about 0.8 acres of intertidal and 0.7 acres of subtidal at this location. Mitigation of the 1.5 acres would be as described above and further detailed in the response to F.2.10 and F.2.11 and Volume 1, section 3.5. As stated above, the size of the fill area would be 1.5 acres. The anticipated duration for dredging is 5-6 months. It is not expected that other dredging projects would occur simultaneously in this region of the bay. Therefore, no cumulative impacts from dredging projects are expected (see Section 3.18 for additional discussion).
H.2.79a	The Navy does not consider that translation of the Draft EIS into Spanish is required to ensure that low income and minority populations have the

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opportunity to fully participate in the NEPA process. A scoping meeting to discuss the issues to be addressed in the EIS was held in Coronado on 10 February 1998. Since that time, the Navy has acknowledged the necessity of including a public hearing in San Diego. Notices of availability for the Draft EIS were placed in *La Prensa.* All responses to public comments generated during the public comment period provided in Spanish are translated into Spanish. The comments are annotated to ensure that the reader has sufficient understanding of the EIS materials without needing to read the EIS itself. The Notice of Availability (NOA), is translated in Spanish, and a telephone 888 support hot line is available in Spanish as well.

The air quality analysis in the Draft EIS is based on compliance with national and state ambient air quality standards. These standards represent allowable atmospheric concentrations at which the public health and welfare are protected and include a reasonable margin of safety to protect the more sensitive individuals in the population, such as elderly people and children. Since the proposed action alternatives would not exceed any ambient air quality standard, public health would be protected from the effects of the proposed action alternatives. Toxic air contaminants (TACs) emissions from the proposed dredging and disposal actions at NASNI would produce insignificant health impacts to the public.

La Marina de los Estados Unidos no considera que la traducción al español del Draft EIS (Estudio de Impacto al Medio Ambiente) es requerida para asegurar que la población de bajos recursos y las minorías tengan la oportunidad de participar totalmente en el proceso conocido como NEPA. Una reunión para analizar los temas que serían tratados en el EIS (Estudio de Impacto al Medio Ambiente) se llevó a cabo en Coronado el 10 de febrero de 1998. Desde aquel momento, la Marina de los Estados Unidos ha reconocido la necesidad de incluir al público en la reunión de San Diego. Los avisos de disponibilidad para el Draft EIS (Estudio de Impacto al Medio Ambiente) fueron publicados en La Prensa. Todas las respuestas a los comentarios públicos generados durante el período de comentarios públicos que fueron provistos en español son traducidos al inglés. Los comentarios son anotados para asegurar que el lector tenga un entendimiento suficiente de los materiales del EIS (Estudio de Impacto al Medio Ambiente) sin la necesidad de tener que leerlo en su totalidad. El Aviso de Disponibilidad (NOA), está traducido al español y hay una línea telefónica 888 que también está disponible en español.

El análisis de la calidad del aire en el Draft EIS (Estudio de Impacto al Medio Ambiente) está basado en cumplimiento con las normas de la calidad del aire ambiental nacional y estatal. Estas normas representan las concentraciones atmosféricas permisibles en las cuales el bienestar y la salud pública están protegidas e incluye un margen razonable de seguridad para proteger a los individuos más sensibles dentro de la población, tales como las personas mayores y los niños. Como las acciones alternativas propuestas no excederían ninguna norma de la calidad del aire ambiental, la salud pública estaría

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protegida de los efectos de las acciones alternativas propuestas. Las emisiones de los contaminantes toxicós del aire (TAC) causadas por el dragado propuesto y por las acciones de deshecho en NASNI, producirían un impacto insignificante en la salud pública.

H.2.79b Cumulative impacts from past projects that affect local air quality and toxic waste emissions were taken into account in this EIS. This EIS presents data that concludes there would be no significant impacts to the fish community from the proposed action. Fish would avoid dredge areas, so they would likely not be affected by any contaminants resuspended during dredging.

Los impactos cumulativos de proyectos pasados que afectan la calidad del aire local y las emisiones de residuos tóxicos fueron tomados en cuenta en este EIS (Estudio de Impacto al Medio Ambiente). Este EIS (Estudio de Impacto al Medio Ambiente) presenta datos que concluyen que no habría impactos significativos en la vida marina debido a la acción propuesta. Los peces evitarían las áreas de dragado, así que probablemente no serían afectados por ninguno de los contaminantes en suspenso después del dragado.

H.2.79c Purchases of local shipbuilding companies by other defense contractors, and the fact that these defense contractors are pursuing bids on ship repair, are common business practice and are beyond the scope of this EIS. The fact that defense contractors may be qualified to perform NNPP radiological work does not imply that NNPP radiological work would be performed: (1) in locations other than the NASNI CIF or (2) in any different manner than the uniform standards established by the NNPP. The purchases would not affect the amount of maintenance performed on homeported CVNs.

Pollution impacts of the Navy's action to homeport USS JOHN C. STENNIS at NASNI were addressed in the Navy's 1995 Final Environmental Impact Statement for the Development of Facilities in San Diego/Coronado to Support the Homeporting of One NIMITZ-Class Aircraft Carrier. Pollution impacts of the proposed action were found not to be significant.

A wide range of hypothetical accidents was considered in the development of the analysis presented in the EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities.

Las compras de compañías locales de astilleros por otros contratistas de defensa, y el hecho que estos contratistas de defensa están llevando a cabo licitaciones para reparaciones de buques, son un práctica comercial común y están más allá del alcance de este EIS (Estudio de Impacto al Medio Ambiente). El hecho que los contratistas de defensa puedan estar capacitados para desempeñar trabajos radiológicos NNPP, no implica que el trabajo radiológico NNPP pueda ser desempeñado: (1) en otras

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ubicaciones aparte de la NASNI CIF o (2) en alguna manera diferente que los estándares uniformes establecidos por el NNPP. Las compras no afectarían la cantidad de mantenimiento llevada a cabo en los CVN que están en el puerto base.

Los impactos de contaminación de la acción de la Marina al USS JOHN C. STENNIS en el puerto base en NASNI fueron tratados en 1995 en la Declaración Final de Impacto Medio Ambiental para el Desarrollo de Instalaciones en San Diego / Coronado para el Soporte de Puerto Base de un Portaaviones Clase NIMITZ. Se ha determinado que los impactos de contaminación por la acción propuesta serán insignifantes.

En el desarrollo de los análisis presentados en el EIS (Estudio de Impacto al Medio Ambiente) se consideraron una amplia diversidad de accidentes hipotéticos. Los resultados de todos los análisis, tanto de operaciones normales como de accidentes hipotéticos indican que no habrán impactos radiológicos significantes por el puerto base y mantenimiento de portaaviones clase NIMITZ, ni por la operación de instalaciones de mantenimiento de portaaviones clase NIMITZ.

H.2.80 Your comments are beyond the scope of this EIS.

H.2.81 Your comments are noted and are included in the Final EIS.

H.2.82 Information on low-level radiation exposure and risk is addressed in Appendix E of the EIS and in response O.12.190. In addition, it is important to note that the results of all the radiological analyses in the EIS, which included cumulative effects, indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities under the proposed action.

H.2.83 Please see response to comment L.4.36.

H.2.84 Your comments are beyond the scope of this EIS.

H.2.85 Your comments are noted and are included in the Final EIS.

H.2.86 Please see response to comment I.4.1. In addition, as described in Chapter 7.0, the stringent procedural and control policies of the NNPP are applied consistently to all locations where nuclear-powered ships are berthed and maintained. All features of design, construction, operation, maintenance, and personnel selection, training, and qualification have been oriented toward minimizing environmental effects and ensuring the health and safety of workers, ships' crew members, and the general public.

H.2.87 The conclusions in the EIS are that there are no significant impacts on health and safety. Please see section 3.15 (Volume 1) and appendices E, F, and J (Volume 2) of the EIS.

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H.2.88	Your comments are noted and are included in the Final EIS.
H.2.89	Your comments are beyond the scope of this EIS.
H.2.90	The Navy's comprehensive radiological environmental monitoring program, which would be continued with implementation of the proposed action, is described in section 7.4.4 of the EIS.
H.2.91	Your comments are noted and are included in the Final EIS.
H.2.92	Your comments are noted and are included in the Final EIS.
H.2.93	*Sus comentarios han sido tomados en cuenta y están incluidos en el EIS (Estudio de Impacto al Medio Ambiente) final.* Your comments are noted and are included in the Final EIS.
H.2.94	Please see responses to comments O.12.33 and L.4.36.
H.2.95	Your comments are noted and are included in the Final EIS.
H.2.96	The traffic analysis presented in the Draft EIS is based on the incremental increase in traffic that would occur as a result of the proposed action. The existing condition has facilities at NASNI to support two conventional aircraft carriers (CVs) and one nuclear carrier (CVN) for a total of three carriers, while Alternatives One, Two, and Three have three CVNs. The proposed action would not result in two additional aircraft carriers, but would simply provide capacity for the homeporting of up to two additional CVNs. As the number of personnel on the CVNs is greater than that on the CVs, the proposed action would generate approximately 27 additional vehicle trips during the peak hours and 150 trips throughout an average day, as outlined in the EIS. The analysis indicates that a traffic increase of this magnitude would not be significant. Please refer to response to comment L.4.12 and Table 3.9-4 in the Final EIS, Volume 1.
H.2.97	Issues regarding which commuters can or cannot take advantage of the toll free status of the carpool lane at the Coronado Bay Bridge are within the jurisdiction of Caltrans and are not addressed in conjunction with this CVN homeporting EIS. With regard to physical roadway improvements to alleviate traffic congestion in the area, the Navy is not responsible for such measures as a mitigation for the CVN homeporting proposed action because the analysis indicates that the proposed action would not result in a significant traffic impact. Although specific traffic-related mitigation measures are not needed to mitigate less than significant impacts of the proposed action, the Navy does have an ongoing series of strategies designed to reduce the level of traffic generated by NASNI, such as a ferry system, carpool/vanpool programs, installation of

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bicycle racks, a guaranteed ride home program (for rideshare users with a mid-day emergency), and an educational program to promote these strategies. In addition, the Navy is seeking funding to redesign of the Main Gate so that the entrance would align with Third Street and thereby provide a more direct connection into and out of the base.

H.2.98 The traffic analysis presented in the Draft EIS is based on the incremental increase in traffic that would occur as a result of the proposed action. The existing condition has facilities at NASNI to support two conventional aircraft carriers (CVs) and one nuclear carrier (CVN) for a total of three carriers, while Alternatives One, Two, and Three have three CVNs. The proposed action would not result in two additional aircraft carriers, but would simply be providing capacity for homeporting up to two additional CVNs. As the number of personnel on the CVNs is greater than that on the CVs, the proposed action would generate approximately 27 additional vehicle trips during the peak hours and 150 trips throughout an average day, as outlined in the EIS. The analysis indicates that a traffic increase of this magnitude would not be significant.

H.2.99 Please refer to responses L.4.44 and I.37.1 for a response to the issue of terrorist acts in San Diego.

H.2.100 Our publicly-elected U.S. Congress and President of the United States make programmatic decisions regarding Naval ships (e.g., application of nuclear power), and thus comments regarding these decisions are beyond the scope of this EIS. The results of all the analyses of both normal operations and hypothetical accidents indicate that there would be no significant radiological impacts from homeporting and maintaining NIMITZ-class aircraft carriers or operating NIMITZ-class aircraft carrier maintenance facilities. Information on low-level radiation exposure and risk is addressed in Appendix E of the EIS and in response O.12.190. Non-cancer risks are addressed in response O.12.27.

H.2.101 Issues associated with constructing and operating the NASNI Depot Maintenance Facility, including the Mixed Waste Storage Facility and Controlled Industrial Facility, were analyzed in reference DON 1995, and are beyond the scope of this EIS. In addition, please see responses to comments L.4.36, I.17.3, and I.4.1.

H.2.102 Your comments are noted and are included in the Final EIS.

H.2.103 Your comments are noted and are included in the Final EIS.

H.2.104 Please see responses to comments L.4.36 and O.10.31.

H.2.105 Please refer to responses O.12.55 and O.12.169 and see comment on responses to GAO report in response to comment I.56.5.

Comment Number	Response
H.2.106	Your comments are noted and are included in the Final EIS.
H.2.107	Your comments are noted and are included in the Final EIS.
H.2.108	Please see response to comment O.12.57.
H.2.109	While CVs and CVNs use different sources of fuel (oil vs. nuclear), both types of ships rely upon steam propulsion plants that require seawater cooling. The seawater cooling requirements are similar and the thermal and marine life impacts from CVs and CVNs are comparable. Maintenance of heat exchangers is accomplished mainly while in dry-dock. When heat exchangers are taken out of service, they are isolated from the environment, cleaned, flushed, tested, and then returned back to service. All cleaning fluids are retained and processed according to their chemical nature.
H.2.110	Your comments are noted and are included in the Final EIS.
H.2.111	Your comments are noted and are included in the Final EIS.
H.2.112	Please see response to comment I.43.16.
H.2.113	Please see response to comment O.12.73 and L.4.36.
H.2.114	Please see response to comment I.43.13.
H.2.115	Your comments are noted and are included in the Final EIS.
H.2.116	Your comments are noted and are included in the Final EIS.
H.2.117	Please see response to comment L.4.36.
H.2.118	Please refer to responses L.4.44 and I.37.1 for a response to this comment on the potential for San Diego to become a military target.
H.2.119	Your comments are noted and are included in the Final EIS. Please see responses to comments O.12.10, O.12.182, O.12.190, and H.2.109.
H.2.120	Your comments are noted and are included in the Final EIS.
H.2.121	Please see response to comment I.4.1.