



25 June 2019

To the Michigan Public Service Commissioners,

I wish to submit these comments in protest of DTE including pitiful little information about their nuclear reactor, Fermi 2, in their IRP. Is it the common consensus among Michigan's governing entities that only the Nuclear Regulatory Commission has authority over Fermi? Well, we need some serious State oversight.

For example, where does the money go that we ratepayers pay on our bills for Fermi's decommissioning?

"The current decommissioning fund estimate is \$1.12 billion," stated DTE's Fermi 2 2018 Decommission filing. "Currently, approximately \$3 million is being collected per year for Fermi 2 decommissioning."

What I thought was a mistake was the sentence, "Currently, \$12 is being place in the radiological nuclear decommissioning account per year..." the report stated, followed by, "Most collections are being placed into other accounts."

While trying to track down the truth of that number, all I got was the runaround, but I kept adding officials to contact. After two days, I finally got answers from both DTE and the NRC with matching stories.

They said Fermi 2 already has adequate decommissioning funds and so the \$12 is the minimum contribution DTE must make to keep the fund open. Here's the kicker:

The ratepayers are being charged on their monthly bill for Fermi 2's decommissioning and DTE is putting \$12 into that account and playing the stock market – or whatever - with the rest of our money that most of us could put to better use.

And could the following be another DTE scam?

"All decommissioning costs are assumed to increase at 6.0% annually; decommissioning funds are assumed to earn at 7.0% after-tax, therefore the real rate of return is less than 2%," stated the filing for Fermi 2.

However, the decommissioning status report for Fermi 1 has different numbers. "Decommissioning costs are assumed to increase at a rate equal to 4.5%...", read that filing which was issued the day after the Fermi 2 filing.

And DTE's Non-Radiological Report, which is under the jurisdiction of the Michigan Dept. of Environmental Quality, speaks to Fermi's pollution of Lake Erie – in addition to the

thermal pollution caused by Fermi extracting 45.1 million gallons per day of Lake Erie water to cool the monster, and then send it back to Lake Erie at temperatures up to 97 degrees.

The Rad report includes the Independent Spent Fuel Storage Installation (ISFSI), which refers to the spent fuel rods moved out of the fuel pool into cement casks sitting on a concrete slab on Lake Erie's shores. The report lists the ISFSI for "sky shine," radiation reading increased near the casks.

The Non-Radiological Report shows that "Two incidents of noncompliance with the Fermi 2 National Pollutant Discharge Elimination System (NPDES) Permit occurred in 2018."

On January 22, 5 -10 gallons of oil made its way to Lake Erie from a leak in the hydrogen seal oil exhaust on top of the turbine building room.

On August 21, a new aboveground storage tank was filled with 300,000 gallons of water from a fire hydrant. 200,000 gallons were pumped into the Fuel Oil Storage Tank. The other 100,000 wouldn't fit without covering electric wires.

The water showed choline levels too high to discharge into Lake Erie, the other 100,000 had to be pumped into the dredge basin.

But no testing was done on Surface Water Sampling, Sediment Sampling, Fish Sampling, or Terrestrial Monitoring. "Based on the findings of the terrestrial monitoring program, which was concluded in 1994, no further aerial-photographic evaluations are planned."

Seriously? They never have to evaluate these categories again. And it's been 25 years. DTE needs to explain these things, and I certainly hope your commission tells them to go back to the drawing board and include Fermi 2 in their details.

Sincerely,

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