



## Sierra Club Nuclear Free Campaign

### COMMENTS ON THE EPA CARBON RULE

#### TELL EPA: NUCLEAR POWER IS NOT PART OF THE CLIMATE SOLUTION!

*On June 2, 2014, the U.S. Environmental Protection Agency announced its proposed rule for reducing carbon dioxide (CO<sub>2</sub>) emissions from existing electrical generation units. This is an important and historic step toward addressing climate change. But EPA's support of nuclear power and underplaying of the importance of renewables and efficiency is of serious concern.*

- ♻️ The EPA Clean Power Plan Proposed Rule supports building new nuclear reactors (power plants) and maintaining existing reactors as an alternative to burning fossil fuels.
- ♻️ The rule encourages states to prevent even the most uncompetitive nuclear reactors from closing.
- ♻️ The rule underestimates the advantages of renewable energy and energy efficiency as the best alternatives for reducing carbon emissions. The rule should acknowledge that renewables and efficiency can produce the power we need without the use of fossil fuels or nuclear power AND they can remove more carbon per dollar spent in a shorter time. Numerous studies have shown that this transition needs only the political will to make it happen.
- ♻️ New nuclear reactors cost billions of dollars and take many years to bring on line. Renewable energy, and especially energy efficiency, are much cheaper and their development is already underway.
- ♻️ EPA incorrectly claims that nuclear power is reliable. This ignores the many times nuclear reactors had to shut for years due to warm water temperatures, flooding, and extreme weather events, all of which will worsen as the climate warms.
- ♻️ Nuclear power is far from carbon-free. Fossil fuels are used for uranium mining, milling, processing, conversion, enrichment, transportation and construction of reactors. Huge amounts of energy will be needed to isolate nuclear waste for millennia—a task which science has so far not been able to address. ***Large amounts of water are also used to operate and cool the reactors.***
- ♻️ EPA seriously minimizes the problem of radioactive waste. In fact, they erroneously contend that radioactive waste avoids the problem of waste from coal-fired generation! Waste from coal is a serious problem but radioactive waste is extremely dangerous and remains so for millions of years. EPA also ignores the routine radioactive releases at all reactors and the several U.S. close calls to nuclear meltdowns. The Sierra Club maintains that the first step toward dealing with nuclear waste and radioactive pollution is to stop generating it.
- ♻️ The proposed rule improperly calls for reductions in CO<sub>2</sub> from 2005 levels. The problem is that CO<sub>2</sub> levels in 2005 were the highest ever. In fact, current levels of CO<sub>2</sub> are 15% less than in 2005. The proposed rule should at least use current levels, or more appropriately, 1990 levels.

*EPA is accepting comments through Oct. 16, 2014. The Sierra Club Nuclear Free Campaign strongly supports EPA's move toward reducing CO<sub>2</sub> emissions, but their inclusion of nuclear reactors as a reliable source of electricity is a mistake. Ask EPA to support closing nuclear reactors in favor of renewables and energy efficiency.*

Comments can be made [online](http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2013-0602-0001) at [www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2013-0602-0001](http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2013-0602-0001). Reference Docket ID EPA-HQ-OAR-2013-0602. Alternatively, fax to 202-566-9744 or mail to EPA Docket Center, Mailcode 28221T, Attn: Docket OAR-2013-0602, 1200 Pennsylvania Ave. NW, Washington, DC 20460.

**EPA will hold four public hearings** on the proposed Clean Power Plan the week of July 28, 2014 in Atlanta, GA; Denver, CO; Pittsburgh, PA; and Washington, DC. Speaking slots are filled but we encourage as many people as possible to attend. Location information can be found [here](#). The link to the EPA proposed rule is [here](#).