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WILLIAM L. BERG
President and CEO

Rules and Directives
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September 20, 2000

Mr. David Meyers
Chief, Rules and Directives Branch
Mailstop T-6D 59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

Dear Mr. Meyers:

SUBJECT: Comments on Draft Environmental Impact Statement for the Construction and Operation of an Independent Spent Fuel Storage Installation on the Reservation of the Skull Valley Band of Goshute Indians and the Related Transportation Facilities in Tooele County, Utah, NUREG-1714, Docket # 72-22, Private Fuel Storage, LLC

Dairyland Power Cooperative (DPC) wishes to comment favorably on the Draft Environmental Impact Statement for the Private Fuel Storage spent nuclear fuel site located on the Skull Valley Indian Reservation. DPC is a generation and transmission cooperative serving 25 rural electric cooperatives located in Wisconsin, Minnesota, Iowa and Illinois.

Dairyland Power Cooperative participated with the U.S. Atomic Energy Commission in the operation of the LaCrosse Boiling Water Reactor. The Atomic Energy Commission provided the nuclear reactor and its associated systems, while Dairyland Power Cooperative provided the turbine/generator and the balance of plant. The project commenced in 1962 and went into commercial operation in 1969. The Federal Government transferred its interest in the reactor plant in 1974 to Dairyland Power Cooperative. The completion of the twenty years of design operation (1967-1987) led to the facility shutdown and the ongoing need to manage the facility and the spent fuel in a SAFSTOR mode at very considerable expense to the consumer members of Dairyland Power. When the facility was described before the U.S. Congress Joint Committee on Atomic Energy prior to construction, the spent fuel was always described as a very significant asset because of its continuing value following reprocessing. This concept was reinforced by similar representations made at the time of the sale of the reactor plant to Dairyland Power.

Continued and expanded operation of individual spent fuel storage sites around the United States would result in a substantially greater total cost for securely and safely managing the nuclear fuel. Due to the necessary maintenance and surveillance activities, it also would require a

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greater radiation exposure to operating staff than for the operation of a single consolidated site for interim storage. The history of shipping radioactive materials in the United States is excellent. Regardless of storage location, the spent nuclear fuel must be transported. It is our opinion that this transport to a single interim site poses no quantifiable threat to the public. The continued operation of individual storage sites, the "no action alternative," is a totally unacceptable expense and poses a long-term environmental impact to the citizens of the United States. We strongly recommend a speedy approval of the license and construction and operation of the site.

While we are no longer in the business of operating a nuclear reactor for the generation of electric power, we note that it has proven historically to be one of the most environmentally satisfactory methods of electric power production. We hope that the 22% of the total electric energy produced by nuclear power in the United States remains available to the national electrical grid.

It will certainly best serve the needs of the consumer members of Dairyland Power Cooperative, and we believe of the entire industry, if the license application of Private Fuel Storage is granted and the facility is constructed and operated as soon as possible.

Sincerely,

DAIRYLAND POWER COOPERATIVE

A handwritten signature in cursive script that reads "William L. Berg / lae".

William L. Berg
President and CEO

WLB:krm:css