

AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL  
(TEMPORARY FORM)

CONTROL NO: 2831

FILE: ENVIRO

FROM: Geothermal Energy Institute San Francisco, California Donald F. X. Finn		DATE OF DOC 3-30-74	DATE REC'D 4-2-74	LTR X	MEMO	RPT	OTHER
TO: AEC		ORIG 1 signed	CC	OTHER	SENT AEC PDR <u>XXX</u> SENT LOCAL PDR <u>XXX</u>		
CLASS XXX	UNCLASS	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: <u>50-438/439</u>		

DESCRIPTION:  
Ltr furn comments re DES for Bellefonte 1 & 2

ENCLOSURES:

**DO NOT REMOVE**

**ACKNOWLEDGED**

PLANT NAME: BELLEFONTE UNITS 1 & 2

FOR ACTION/INFORMATION

4-3-74

GMC

BUTLER(L) W/ Copies	✓ SCHWENCER(L) W/1 Copies info	ZIEMANN(L) W/ Copies	✓ REGAN(E) W/1 Copies
CLARK(L) W/ Copies	STOLZ(L) W/ Copies	DICKER(E) W/ Copies	W/ Copies
GOLLER(L) W/ Copies	VASSALLO(L) W/ Copies	KNIGHTON(E) W/ Copies	W/ Copies
KNIEL(L) W/ Copies	SCHEMEL(L) W/ Copies	YOUNGBLOOD(E) W/ Copies	W/ Copies

INTERNAL DISTRIBUTION

✓ <u>REG FILE</u> Ltr 439	<u>TECH REVIEW</u>	DENTON	<u>LIC ASST</u>	<u>A/T IND</u>
✓ AEC PDR Ltr 439	HENDRIE	GRIMES		BRAITMAN
✓ OGC, ROOM P-506A	SCHROEDER	GAMMILL	DIGGS (L)	SALTZMAN
✓ MUNIZING/STAFF	MACCARY	KASTNER	✓ GEARIN (L)	B. HURT
CASE	KNIGHT	✓ BALLARD	✓ GOULBOURNE (L)	<u>PLANS</u>
GIAMBUSSO	PAWLICKI	SPANGLER	LEE (L)	MCDONALD
BOYD	SHAO		MAIGRET (L)	DUBE w/Input
✓ MOORE (L)(BWR)	STELLO	<u>ENVIRO</u>	✓ REED (E)	<u>INFO</u>
DEYOUNG(L)(PWR)	HOUSTON	MULLER	SERVICE (L)	C. MILES
SKOVHOLT (L)	NOVAK	DICKER	SHEPPARD (L)	B. KING
P. COLLINS	ROSS	KNIGHTON	SLATER (E)	
DENISE	IPPOLITO	YOUNGBLOOD	SMITH (L)	
✓ <u>REG OPR</u>	TEDESCO	REGAN	TEETS (L)	
FILE & REGION(3)	LONG	PROJECT LDR	WADE (E)	
MORRIS	LAINAS	✓ <u>DITTMAN (2)</u>	WILLIAMS (E)	
STEELE	✓ BENAROYA	✓ HARLESS	WILSON (L)	
	VOLLMER			

EXTERNAL DISTRIBUTION

✓ 1 - LOCAL PDR SCOTTSBORO, ALA	✓ (1) (2)(10)-NATIONAL LAB'S <u>ANL</u>	1-PDR-SAN/LA/NY
✓ 1 - DTIE(ABERNATHY)	1-ASLBP(E/W Bldg, Rm 529)	1-GERALD LELLOUCHE
✓ 1 - NSIC(BUCHANAN)	✓ 1-W. PENNINGTON, Rm E-201 GT	BROOKHAVEN NAT. LAB
1 - ASLB(YORE)	1-CONSULTANT'S	1-AGMED(Ruth Gussman)
	NEWMARK/BLUME/AGBABIAN	RM-B-127, GT.
16 - CYS ACRS HOLDING	1-GERALD ULRIKSON...ORNL	1-RD..MULLER..F-309 GT

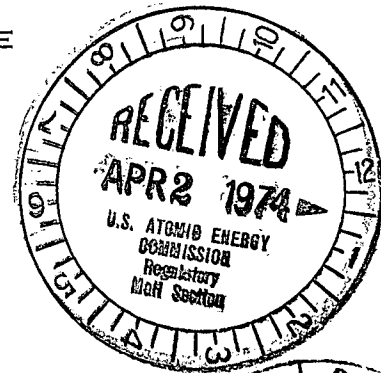
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## GEOHERMAL ENERGY INSTITUTE

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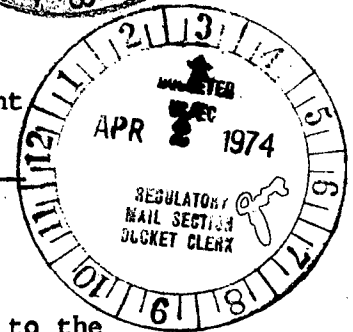
March 30, 1974

50-438/439



Atomic Energy Commission  
 Washington, D. C.

RE: Proposed Bellefonte Nuclear Power Plant  
 Units 1 & 2  
Jackson County, Alabama



Gentlepersons:

We submit the following comments in response to the issuance by your staff of the draft environmental impact statement related to these proposed nuclear reactor-steam generator power plants (2 units producing 3600 MW thermal heat and 1221 MW of electricity each).

We are of the opinion that the section on economics (9.1.2.1) and costs (10.4) are not adequate enough to be reviewed.

We question whether the capacity factors of the applicant (e.g., 80% for the first 15 years) can be relied upon; and whether the staff has taken the rapidly rising costs of uranium fuels sufficiently into account; and whether it is proper to rely upon the 1970 National Power Survey report as an accurate source of information with respect to projected fuel costs; and whether the costs of reprocessing fuel or disposing of it have been adequately examined.

The nuclear industry is facing a "reprocessing crunch" and the applicant has not taken steps to assure itself of adequate reprocessing capacity - nor does it appear that it has secured a reliable source of nuclear fuel at a price certain.

No economic analysis is made of geothermal alternatives.

We believe it to be a mistake to assume, as the staff does, that the fuel and operation costs will not increase significantly over the life of the plant in view of general economic conditions and industry expectations generally.

Finally we are of the opinion that the analysis of radioactive waste disposals is inadequate. The subject should be treated directly and succinctly without reference to other documents and the facts as to the ultimate disposal of the wastes should be clearly set forth.

Sincerely yours,

Donald F. X. Finn

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