

**AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)**

CONTROL NO: 2637

FILE: ENVIRO

FROM: Geothermal Energy Institute San Francisco, Cal. 94109 D. F. X. Finn		DATE OF DOC 3-20-74	DATE REC'D 3-28-74	LTR X	MEMO	RPT	OTHER
TO: D. L.		ORIG 1 signed	CC	OTHER	SENT AEC PDR		X
					SENT LOCAL PDR		X
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-438/439		

DESCRIPTION:
Ltr furnishing comments on the alternative energy sources section of the Feb 74 Draft Enviro Statement for Bellefonte Units 1 & 2....

ENCLOSURES:

DO NOT REMOVE

ACKNOWLEDGED

PLANT NAME: Bellefonte Units 1 & 2

FOR ACTION/INFORMATION

3-28-74 GC

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

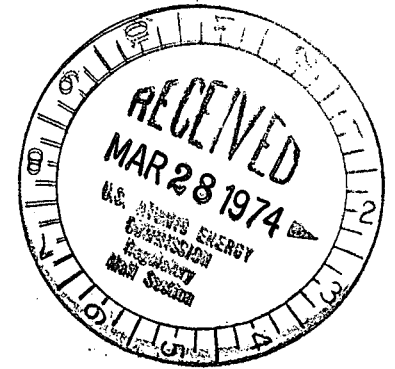
EXTERNAL DISTRIBUTION

✓ 1 - LOCAL PDR <u>Scottsboro, Ala.</u>	✓ (1) X (2) X (3) X 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)
16 - CYS ACRS HOLDING	NEWMARK/BLUME/AGBABIAN	RM-B-127, GT.
	1-GERALD ULRIKSON...ORNL	1-RD..MULLER..F-309 GT

CB

Regulatory Docket File

GEOTHERMAL ENERGY INSTITUTE
680 BEACH STREET, SUITE 426
SAN FRANCISCO, CALIFORNIA 94109
(415) 474-0404



March 20, 1974

Atomic Energy Commission
Washington, D.C. 20545

RE: AEC Dkt. Nos. ~~50~~-438, 50-439
Bellefonte Nuclear Plant
Jackson County, Alabama

Gentlemen:

May we comment on the alternative energy sources section of the February 1974 draft environmental statement prepared by your staff with respect of two proposed 1221 MW nuclear power plants scheduled for 1979-1980 operation.

In our opinion the summary statement that "The staff does not consider geothermal energy as a viable energy source on the TVA system" (page 9-3) is not an adequate independent assessment of geothermal alternatives required by NEPA and the Commission's own rules.

This opinion is unsupported by factual data or analysis and is buttressed merely by reference to the applicant's self-serving statement that "The potential for geothermal power is very low and no sites have been identified to date in the TVA system."

No reference is made to the significant geothermal - geopressured potential of the Gulf Coast which is quite significant as Hon. John Nassikas, Chairman of the Federal Power Commission, recently pointed out in testimony to the Congress.

In our opinion there is no factual basis supporting the staff's opinion, and it is one which cannot be intelligently reviewed.

We also believe that the staff's comments on "other energy sources" on page 9-4 are also inadequate. We do not believe that the mere "review of current literature" (i.e., three references: the 1970 National Power Survey, a 1972 Interior pamphlet, and a 1973 paper by S. Baron) is an adequate basis on which to judge new energy conversion methods.

Very truly yours,

A handwritten signature in cursive script that reads "Donald F.X. Finn".

Donald F.X. Finn
Managing Director

DF/jm

cc: Hon. John J. Sparkman, Senator, State of Alabama
Hon. James B. Allen, Senator, State of Alabama
Hon. Robert E. Jones, Representative, Jackson County

