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DESCRIPTION:
Ltr furnishing comments on Draft Enviro Statement for Monticello Nuclear Plant.....

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PLANT NAMES: Monticello Nuclear Generating Plant

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June 30, 1972



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Directorate of Licensing
U.S. Atomic Energy Commission
Washington, D.C. 20545

Reference:
Northern States Power Co.
Docket No. 50-263

COMMENTS ON THE DRAFT ENVIRONMENTAL STATEMENT BY THE U.S.A.E.C.
DIRECTORATE OF LICENSING**MONTICELLO NUCLEAR GENERATING PLANT

I

Experience with past nuclear reactors, e.g., Elk River, teaches that the lifetime of the installation is limited by the onset of conditions of leakage within the system which are antithetical to public health. Experience has shown, further, that at the time it is no longer wise to continue operations, the installation is generally contaminated so generally that restoration to non-contaminated status is difficult and expensive to accomplish.

Nowhere in the Directorate's Environmental Statement does he address the cost of either cleaning up the plant after it is once abandoned, or alternatively, the cost of allowing the land and plant investment to stand idle and non-productive.

Our tax laws suggest that if, let us say after ten years of operation, the plant must be terminated due to the development of unsafe conditions, then NSP might simply let that property revert to public ownership, through non-payment of taxes. Once in the hands of the State of Minnesota, the property would be non-productive of any benefit; it would produce no tax revenue; it would require maintenance to assure against accidents by interlopers, or alternatively, it would demand dismantling and neutralization by State authority at State expense.

That cost is a very real and important cost, one that will only become apparent after the passage of time. Nonetheless it is a cost which must be evaluated as a part of the present Environmental Statement, if the AEC is to properly address the areas of its responsibility under NEPA.

II

In the list of POSTULATED ACCIDENTS there does not appear two very real possibilities which can be expected to result in problems of far greater severity than any which have been identified.

Failure of the emergency core cooling system might lead to the so-called "China problem" with the accompanying release of large quantities of radioactive poisons. This Environmental Statement

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properly ought to accept as finite the possibility of such an accident and enumerate in considerable detail the impact of the accident upon the environment. Where the impact is understood incompletely, that ought to be pointedly noted, and the effects of a worst possible accident ought to be spelled out.

The recent Vietnam experience makes it abundantly clear that in times of war, power plants are prime targets for enemy bombing. This Environmental Statement has no section devoted to explaining the outcome of dropping a nominal bomb or a super bomb, e.g., a "Daisy Cutter," upon the installation. The Environmental Statement properly ought to assess the expected release of such poisons as plutonium from the reactor, the extent of the fall out, the property damage and the loss of life to the human, animal and plant world. Bombing might also be brought to bear by enemy action on the ground, as experienced in So. Vietnam in the vicinity of Saigon during the Tet offensive, where the enemy was able to infiltrate weapons to within striking distance by rocket launcher. The possibility of action by a crack pot, or an organized terrorist organization ought to be carefully evaluated, and the question which this Environmental Statement must answer is not the probability of such an accident, but the effects of such an accident when it happens.

III

The Environmental Statement takes a microscopic view of this single nuclear facility and discusses the output of radioactive poisons from this facility as if it were the only source of insult.

The cumulative dose of radioactive poisons from this Monticello plant must be added to the radioactive poisons present naturally as well as those which may be expected from additional weapons test fallout and from all the other nuclear power plants contemplated for this country and the world.

The Environmental Statement repeatedly makes the self-serving (to the promotion of a favorable result) comment that releases are "small" and that the chances of an accident are "highly improbable." The values ought to be more critically estimated, and the outcome for this nation as a whole ought to be evaluated. I.e., one is not entitled to take comfort from the estimate that "such an accident has a probability of occurring only once in 100 years," if we have 50 such plants scattered around the country, where the odds have it that such an accident is expected on the average, nation-wide, every 2 years.

This last point is nicely illustrated by the editorial, "Don'tt Blame the Environmentalists," by Gil Bailey, appearing in the

St. Paul Pioneer Press at page 8 for June 30, 1972:

yea "The Army Core of Engineers talks about storms in terms of how often a strong storm is likely to occur--a five-year storm, a 10-year storm, a 100-year storm.

"Any reporter who covers floods finds out that a 100-year storm is likely to occur about once every three years. I've covered five floods called 100-year storms myself, and I'm not that old."

IV

These are only a sampling of my concern about the adequacy of the Environmental Statement.

A more fundamental concern stems from the fact that the Statement was drafted by the same agency which is promoting the development of nuclear energy. The marvelous capacity of the Agency research establishment may be brought to bear upon the problem of dressing up an acceptable Environmental Statement, but one that makes light of the deficiencies and skips over relevant issues.

It is not enough to say that the Environmental Statement will be subject to public hearing, because the public does not have the capacity equal to that of the agency to make out its case. Thus the "public hearing" is a sham. The public does not have full and complete access to the information; the public does not have the investigators to delve into the issues and follow up the loose ends.

It is further distressing to approach this issue with the present stance of the Agency, which is now pronouncedly intolerant of public interference in licensing matters (vis. the Schaesinger Bar Harbor speech.).

V

My information is that the AEC will have a public hearing on the Environmental Statement as a part of the Agency environmental review being conducted pursuant to the requirements of the National Environmental Policy Act.. It is further understood that at this hearing, the AEC staff will be available for testimony and cross examination.

I will appear and participate fully as a party in this hearing; therefore, the above comments should not be interpreted to be the complete statement of the undersigned; these comments plus other considerations will be more fully explored at the public

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Comments of F.A.Fleming

hearing.

We reserve the right to make additional comments on the
Environmental Statement based on the record of the public hearing.

Respectfully submitted,

Frederick A. Fleming
June 30, 1972.

