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July 3, 1972

U.S. Atomic Energy Commission
Deputy Director for Reactor Projects
Directorate of Licensing
Washington, D.C. 20545

50-263

Dear Sir:

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JULZ

The limited 30 day comment period for review of the AEC draft environmental impact statement on the Monticello Nuclear Generating Plant has allowed time only for preparation of general comments. Our comments will be greatly expanded and presented at the hearing to be held following the issuance of the final impact statement.

The conclusions reached in the statement do not have an adequate foundation.

The examples to be given below are not to be regarded as a specification of our contentions in this matter.

The statement is deficient in two general ways. First, sections which cover adequate categories of subject matter do not provide enough discussion on many of the matters specified. Secondly, many of the sections are too narrow in the scope of subject matters discussed. Sections V, VI, VII, VIII, IX, X, and XI best typify those sections which are too narrow in scope.

The section on transportation is an example of incomplete discussion. There is no discussion on specific transportation routes or times of shipment. There is no discussion on minimization of dose during shipment through operating procedures. A discussion of transportation accidents with less than "serious injuries" should be included.

The narrow scope is most clearly demonstrated by the section on alternatives. It is inconceivable that an environmental statement on a nuclear plant does not contain a discussion of alternative and more extensive radwaste treatment systems.

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There is a lack of clarity in some areas, together with incorrect figure and table numbers. This, no doubt, is an inherent draft disease and can easily be cured. We look forward to a significantly expanded and more meaningful environmental statement on the Monticello Nuclear Generating Plant.

Sincereky

Ken Dzugan

Research Scientist

KD/cdq