

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 7901040071 DOC. DATE: 78/12/29 NOTARIZED: NO
 FACIL: 50-220 NINE MILE POINT #1, NIAGARA MOHAWK POWER CORP.
 AUTH. NAME REINART, S. AUTHOR AFFILIATION Ecology Action of Oswego
 REIP. NAME IPPOLITO, T.A. RECIPIENT AFFILIATION ***OPERATING REACTORS BRANCH 3

DOCKET # 05000220

SUBJECT: Objects to util's plan to install new radwaste solidification & handling sys. Believes util's safety & environ claims are unjustified & that proposals camouflage plans for long range changes.

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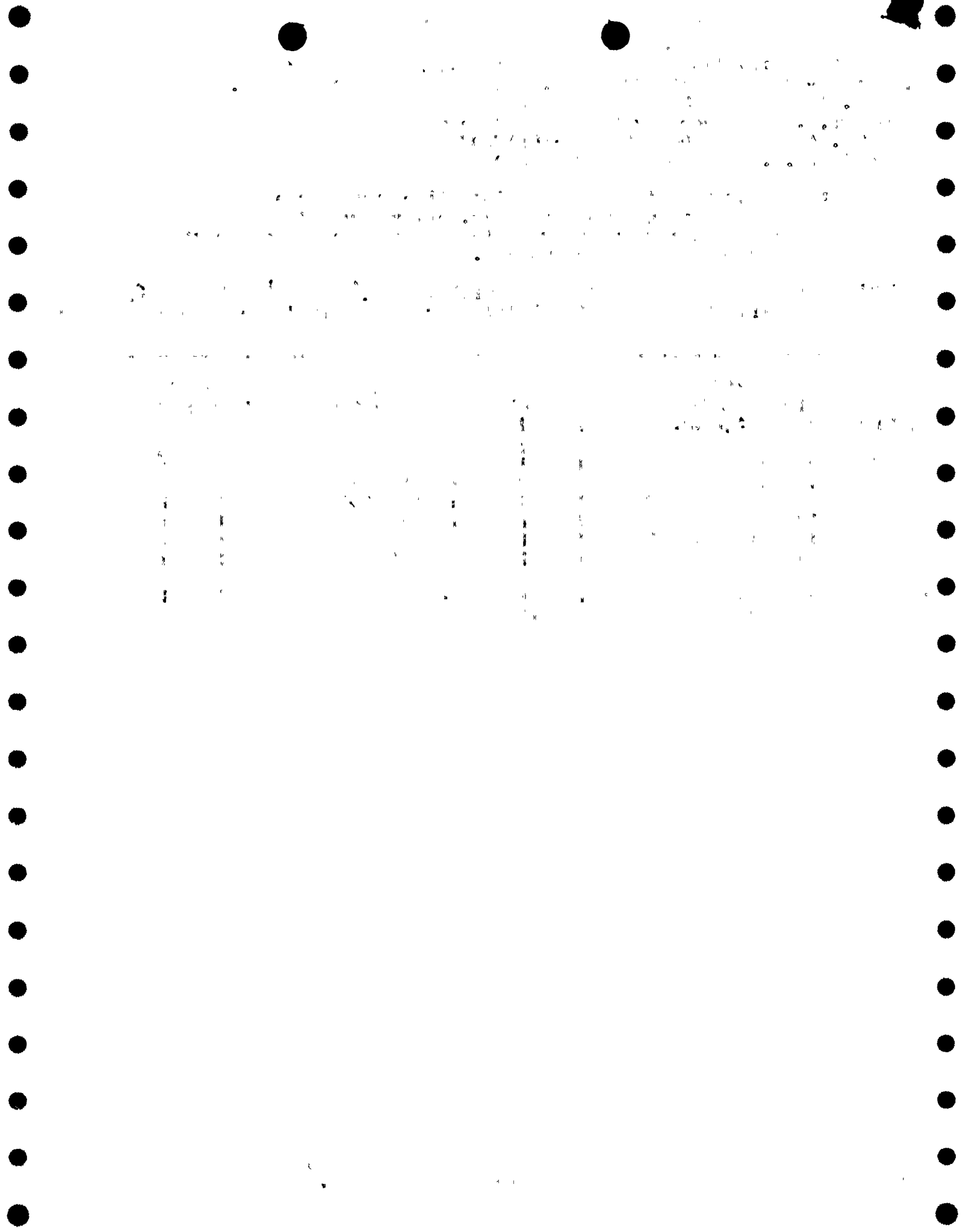
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Box 94
Oswego, New York 13126
December 29, 1978

Thomas Ippolito
Nuclear Regulatory Commission
Washington, DC

Dear Mr. Ippolito:

We want to comment on Niagara Mohawk Power Corp.'s plan to install a new radioactive waste solidification and handling system at Nine Mile Unit 1, as outlined in the company's letter to you on November 30, 1978. We strongly disagree with Niagara Mohawk's conclusion that the new system does not involve an unreviewed safety question and will have no significant environmental impact.

Further, this new system is intimately connected to Niagara Mohawk's plan to install a radioactive waste incinerator at this plant. As we understand it, the incinerator would be housed in the building that the company now proposes to construct. The Commission staff is now reviewing the radwaste incinerator proposal. It seems to us that Niagara Mohawk's latest application is merely a ploy to allow the incinerator project to begin before Commission approval. In any case, it doesn't make sense to consider the new building alone.

For instance, it may be true that the present system breaks down often (as Niagara Mohawk admits) and the resulting maintenance increases worker exposure. But in that case, it might be wiser to replace the present equipment with more reliable components of the same sort — not with remote barrel grab mechanisms, overhead cranes and tv cameras. This very sophisticated equipment is necessary only to handle the intensely radioactive ash from the proposed radwaste incinerator. This is the kind of problem that makes it difficult to separate the incinerator from the building.

One special problem is posed by construction of the new building next to the present waste storage building. In its annual environmental reports, Niagara Mohawk has mentioned several times that radiation levels in the vicinity of the radwaste building are unusually high. In view of this, the company should be required to estimate the maximum radiation doses that will be received by construction workers on this job.

Niagara Mohawk's description of the new system is vague and offers no justification for its claims that the system will reduce worker exposure and provide superior performance and reliability. What facts, either from design specifics or actual experience, can the company provide to prove its assertion that the new system will work better than the old? What will be the consequences of a breakdown of the remote handling equipment or a leak in the decant tanks? What kind of maintenance will be required? None of these questions are even addressed in the November 30 letter.

The company says there is no potential for a new "type" of accident because the total radwaste input hasn't changed. One could say the same

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thing about applications to enlarge the capacity of spent fuel pools at reactors. The total waste input is the same; the only difference is that there is more of it at one time in one place. Here, Niagara Mohawk wants to build a new waste building that is about twice as large as the old one, with a vastly increased storage capacity. Is this so different from an application to store more spent fuel? Surely no one is claiming that low level waste is a benign substance. The logical result of Niagara Mohawk's reasoning is that an unlimited amount of low level waste can be handled and stored at Nine Mile Point as long as it all comes from Unit 1.

The environmental aspects of this proposal are treated even more cavalierly than the safety questions. Niagara Mohawk offers nothing more than the bald statement that there won't be a significant impact. What will the radiation levels be within the new building? It is reasonable to assume the levels will be high in an area with limited access. Will ventilation of the building increase radiation emissions from the Unit 1 site? How much additional liquid waste will come from the decant tanks? How much additional solid waste will be created -- the equipment and related components, and the building itself? What will be done with the old radwaste building?

What is the cost of this new system? Can it be justified if there is no incinerator? Can it be justified at all?

The problem of low level waste has been blissfully ignored by the industry and the Commission in the past. Yet it is precisely this kind of radioactive waste that has escaped into the environment from disposal areas. The Commission must stop allowing reactor operators to keep treating low level waste like ordinary garbage instead of radioactive material.

We ask that the Niagara Mohawk radwaste handling proposal be considered along with the radwaste incinerator application, not separately. We reiterate the request we made in connection with the incinerator plan: for hearings with opportunity for public intervention, and a full environmental impact statement.

Sincerely,



Sue Reinert
Ecology Action of Oswego

Copies to: Joseph Hendrie, Sen. Patrick Moynihan, Sen. Jacob Javits, Assemblyman John Zagame, James Larocca, Herbert VanSchaack (Chairman, Oswego County Legislature), James Best (Oswego County Legislature Nuclear Facilities Committee), Thomas Cochran (Natural Resources Defense Council), David Berick (Environmental Policy Center), Jim Cubie (Union of Concerned Scientists), Lorna Salzman (Friends of the Earth), Marvin Resnikoff (Sierra Club), Richard Hermans (Safe Energy Coalition of New York State).

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DECEMBER 28 1978

Docket No. 50-220

Mr. Robert E. Deyle
Oswego County Planning Board
46 E. Bridge Street
Oswego, New York 13126

Dear Mr. Deyle:

We have received your letter of December 14, 1978 regarding Niagara Mohawk Power Corporation's proposal that the Radwaste Volume Reduction System be considered separately from the solidification and handling system. You indicated a concern regarding the separation of issues, in that this might preclude discussions of the solidification and handling system during hearings that may be held pursuant to the volume reduction system review.

Subsequent to receipt of your letter, there was a phone conversation between you and our staff project manager. At that time we indicated that the subject of separation was under staff review. In consonance with this conversation we will apprise you of our determination expected late in January 1979.

In your letter you also requested that we forward all correspondence between the NRC and Niagara Mohawk. Our distribution of all outgoing correspondence has been revised to reflect your request. With regard to incoming correspondence from Niagara Mohawk, we suggested, and you agreed, to make other suitable arrangements to receive this information more directly.

Please advise us if we can be of further assistance in this regard.

Sincerely,

Original signed by

Thomas A. Ippolito, Chief
Operating Reactors Branch #3
Division of Operating Reactors

CC:
James Best, Chmn., Energy Facilities Committee
Herbert VanSchaack, Chmn., Oswego County Legislature.
Jay Dunkleberger, New York State Energy Office
Thomas Elsassert, State Liaison Office, NRC Region 4

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OSWEGO COUNTY PLANNING BOARD

December 14, 1978

Mr. Thomas Ippolito, Chief
Nuclear Reactor Regulation
Operating Reactors Branch # 3
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Ippolito:

I have recently obtained a copy of a letter written by Donald Dise of Niagara Mohawk to you dated 30 November 1978, in which Mr. Dise proposes that the radwaste volume reduction system be considered separately from the solidification and handling system. Attachments to Mr. Dise's letter describe the waste solidification and handling system and provide evidence to support Niagara Mohawk's contentions that no unresolved safety questions exist and no new significant environmental impacts will result from construction or operation of the solidification and handling system.

Has the N.R.C. made a determination on whether or not to accept Niagara Mohawk's proposal to review the application for the waste solidification and handling system as separate from the proposed radwaste volume reduction system, despite the fact that both systems will ultimately be housed in the same structure and comprise an integrated system for waste reduction, solidification, and handling? If separate applications are permitted as proposed by Niagara Mohawk, would the waste solidification and handling system be excluded from discussion in a public hearing held pursuant to a separate application for the radwaste volume reduction system?

The Energy Facilities Committee of the Oswego County Legislature is attempting to follow developments in Niagara Mohawk's proposal to construct and operate the radwaste solidification, handling and reduction system. I serve as staff to this committee. We are hampered in our efforts by having to receive information such as the letter to which I refer by the grace of the New York State Energy Office. Would you please arrange for us to receive copies of all future correspondence between the NRC and Niagara Mohawk on this proposal, including the waste solidification and handling system and the waste volume reduction system? Thank you.

Sincerely,

Robert E. Deyle
Robert E. Deyle

RED:mj

cc: James Best, Chmn., Energy Facilities Committee
Herbert VanSchaack, Chmn., Oswego County Legislature
Jay Dunkleberger, New York State Energy Office
Philip Polk, Division of Operating Reactors, NRC
Thomas Elsasser, State Liaison Officer, NRC Region I

