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SUBJECT: Comments on DES for facilities.Document fails to approach basic characteristics necessary for ASLB to exercise statutory powers.ALARA criterion does not address environ impact.

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Joel Jaffer
2479 SW 13 St.
Miami, Fla. 33145

February 20, 1981

Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Docket Nos. 50-250, 251

Dear Sir:

You are entitled to my comments on your Draft Environmental Statement related to steam generator repair at Turkey Point Plant Units 3 and 4, Florida Power and Light Company, NUREG-0743, in the above-numbered matters. I apologize for not presently being appraised of the current Regulations (10 CFR) with respect to acceptable radiation doses, or the effect any changes in the Code may have on the statement's vitality.

The decision to amend the operating license of FPL in this case is somehow not reflected in the statement with the concerns that such a major decision would require for the de facto re-issuing of the 10-year old license and plant. The licensing authority is not only different but that of strictly a professional body, the Environmental Statement required by 42 USC 4331 has seen drastic change (as has the new commission's responsibilities with respect thereto), and the available body of knowledge in this area has, if you'll pardon the expression, mushroomed since 1972.

The Old F.E.S. is thus incapable of providing an objective environmental comparison for the purposes of normal plant operation (4.1.2.5) (4.1.1.5), Effluent wastes (4.1.2.1), Solid wastes (4.1.2.2), because of the (new) impacts of waste-disposal, various high-energy minerals, and other costs, notably the canals and leaks associated therewith, that were not known or considered back then.

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Another forgotten aspect of this proposed Amendment to the license is that the time of repair cannot be seriously considered

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as an impact on license - by definition. If so, then Turkey Point would require, or at least be in a mode to consider, continual repairs. (This may happen, anyway.) Thus, the projected cost of replacement power, without objective comparison as previously explained, cannot be a basis for an economic analysis of benefits to the original plant, and licenses; nor can projected time for a Licensing Hearing be a factor weighing against an un-amended License; nor against certain alternatives in the steam generator repairs (5.4).

Besides recent developments in radiation research not accounted in your Statement, very basic tenents of nuclear fission at this point deserve some review. Radioactivity is the process of releasing radiation to the environment by decay of fissionable material. If radioactive wastes or generators cool to the point of acceptable low levels of contamination, this only goes to prove that excess energy and radiation have already escaped to the environment through decay. It makes no difference whether it has escaped into a holding tank, a railroad car, a cooling canal or even, arguably, a deep mine in South Carolina. In all but the last-mentioned case, the release to the general atmosphere and environment - when you open the door, is obvious. The Statement thus ignores any release to the environment except direct human contact through air, water or soil. The intermediate releases must be addressed. (This of course is the main challenge of an environmental impact statement - to chart the effect of the release of billions of particles of energy which individually or in small packets can sometimes do substantial harm).

Summarizing only, for the sake of time, the most pertinent blunders scattered throughout the remainder of the Statement, it suffices to say that the only environment addressed by, or even cognizably recognized by, the Statement, is the environment of the office building in Washington, DC housing the Division of Licensing, NRC. It would be as well for the Statement to study the number of Republicans within 50-miles of the Turkey Point Plant and estimate the cost of getting them all to the polls -

for the next 20 years and the "reasonable assurance" of a Republican victory every 8 years.

In Section 3.0 a fatal observation concludes that the proposed repairs "eliminate the potential" for tube degredation when in fact the SER concludes that such degredation is merely more "unlikely" — a qualification of its still existent potential.

Section 4.1.1.5 compares a short-term (repair) environmental impact with that from the life of the plant instead of that for a similar term.

Section 4.1.1.6 compares radiation poisoning causing a pre-mature death with the health otherwise spread over a lifetime, so cut short. The proper comparison should be with the health lost between the pre-mature death and the otherwise, or mature, natural death, prospectively.

The report repeatedly compares radiation during repair to the fully operational plant, not taking into account the operation of the plant during repair.

The report repeatedly makes comparisons to "background radiation" when such a term is admittedly meaningless for lack of qualification against CFR criteria or WTMI's radio signals. Background radiation harmful to life to a significant degree has also admittedly doubled in South Florida even since the beginning of this Study.

Filling, etc. causes damage by the blocking of underground and surface-to-air estuaries, not the erosion thereof. (4.3.1)

The physical acts of construction do not create long-term adverse effects except for the thing constructed. Sanitary and other wastes also still alter AN environment antiseptic-ally cleansed of all "species". Aquatic organisms are not present in the canals but where those canals flush.

The report does not contain assesments on the effects on endangered species or historic or cultural resources.

The impact of accidents is addressed (4.4) in terms of normal operations not involving accidents as likely, and in danger to the public but not the environment.

As to alternatives, how can operation in a derated mode have "preference" to shutting the units down when replacement (opposed to repair) is not "feasible"? $2 billion

is certainly in the same ballpark as the estimates for either running derated or shutting the units down while repair is ongoing. The "health safety of the public" can here not again be confused with overall impact on the environment.

In Conclusion (6.0), the Draft Statement fails to approach the basic characteristics necessary for the Licensing Board to exercise powers conferred upon it by Legislation. Professional judgement developed in the SER is meted by other standards. The "ALARA" criterion addresses technology efficiency but not its relationship to the environment; and the proposed amendment's effect is measured against the original License instead of the Liscense's effects being studied as amended.

Thank you and Mr. Grotenhuis for allowing me to broach my thoughts, logic, and what little knowledge I have to this subject. I hope if there is further opportunity for involvement in this licensing process that I will have a chance to participate.

Yours truly,

Joel Jaffe

Joel Jaffe