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 MANN, D. Susquehanna Alliance  
 RECIP. NAME RECIPIENT AFFILIATION  
 MILLER, D. Division of Site Safety & Environmental Analysis

SUBJECT: Submits summary of areas of concern re DES. Requests extension to continue review & file more detailed comments.

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Susquehanna Alliance  
PO Box 249  
Lewisburg, Pa 17837

August 17, 1979

Daniel Muller  
Director, Division of Site Safety and  
Environmental Analysis  
Office of Nuclear Reactor Regulation  
US Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr Muller,

In a letter to you, dated August 7, I requested an extension of the public comment period on behalf of the Susquehanna Alliance, for the Draft Environmental Statement related to the operation of Susquehanna Steam Electric Stations 1 and 2 (Docket Nos 50-387 and 50-388). I had indicated in that letter that the Susquehanna Alliance was undertaking a review of the statement and felt that an extension should be granted to allow time for inclusion of data now being collected on the causes and effects of the accident at Three Mile Island. Specifically, we felt that the period should be extended beyond October 25, 1979 at which time the President's Commission is expected to issue their final report. This extension would also allow time for wider public comment on the statement. We know of many citizens who only learned of the availability of the document during the past couple weeks and have not had sufficient time to obtain a copy and review it.

In a conversation on August 16 with Mr Leech, Project Manager, I learned that my letter had not yet been received and that it was unlikely that a decision would be made on the extension until after the initial deadline, August 21, had passed. I am therefore submitting to you a summary of the areas of concern that the Susquehanna Alliance has regarding the Draft Environmental Statement. We anticipate that your office will grant the requested extension and we will, during that time, continue our review and file more detailed explanations of our concerns. Here, then, are our initial comments:

- 1) Several comments in the statement with regard to the preservation of cultural resources cause concern. The staff indicates that there have been indications that cultural resources may exist on the plant site and on associated PP&L properties and that if they exist they might qualify for inclusion in the National Register. No systematic survey has been undertaken to determine if such sites exist yet the staff seems to feel strongly enough about the possible existence of such sites to include a warning in their summary that such sites could be damaged if no preventative measures are taken.

Yet the staff does not require a cultural resource survey be undertaken to determine what sites may exist and will be (or have already been) damaged by the construction of the plant and

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associated projects. The staff specifically mentions the recreational area near the river. It is our understanding that the applicant has recently begun construction there without a cultural resource survey having been completed. Guidelines based on the National Environmental Policy Act and established through the Council on Environmental Quality and the Advisory Council on Historical Preservation require not only the protection of properties listed in the National Register but also those eligible. Furthermore, if no systematic survey of the area has been completed, it must be initiated and the data submitted to the Office of Archaeology and Historic Preservation for a determination of eligibility. We feel these actions should be undertaken immediately.

- 2) The discussion of the effects of the uranium fuel cycle appears to be incomplete. Table 4.14 does not list any value for the effect of Radon 222. The staff notes the absence of this figure and then proceeds to develop their own criteria for evaluating the effect of Radon. What they fail to mention is that this number was vacated from the table as the result of evidence produced during the hearings for the licensing of Three Mile Island Unit II in which Dr Chauncey Kepford, an intervenor, indicated that the value previously used was in error by an order of magnitude of well over 100,000. His calculations were based on the previous number used but extended over the full period during which Radon would be emitted to the atmosphere. This topic is still under consideration by the commission and their final report should be included in the environmental statement.

The staff draws the conclusion that, despite the extreme toxicity of high level wastes, there will be no environmental impact related to their storage in a Federal repository. This does not take into account the current controversy over whether or not a 100% safe repository can be found (or developed). There are reports from several government agencies indicating that no demonstrably safe method exists of disposing of these wastes. The damage done to the environment by leaks at the Hanford low level disposal site and the reprocessing plant at West Valley should be sufficient to raise suspicions about the feasibility of developing such a repository.

- 3) In the discussion of the potential radiological effects of accidents at the plant site there is only a footnote about the accident at Three Mile Island indicating "these calculations do not take into consideration the experience gained ...". There are those that contend that the accident was in fact a class nine accident. To our knowledge no final ruling has been issued on this. Since the "improbable" series of events did happen at Three Mile Island, the effects of other "improbable" accidents should be considered. The full effects of this accident should be studied and included in any environmental impact accident issued in relation to the operation (or construction) of a nuclear plant.

- 4) The report does not fairly represent the growing controversy over the effects of low level radiation. Time after time the assumption is made that as long as the radiation contributed to the environment is sufficiently lower than normal background levels or is below existing federal standards, that the health effects will be minimal. This does not take into account the growing feeling among the scientific community that there is not a radiation level below which there are no ill effects. Mention should be made of the reports which indicate that continued exposure to even low levels of radiation can be damaging and those that propose that in light of recent studies, federal standards be lowered.
- 5) The report does not fairly treat the possibility of the use of an anthracite fired plant as an alternative. The use of such a plant in the midst of Pennsylvania's anthracite fields could have a tremendous beneficial impact on the area. The use of modern technology to mine the anthracite in the area would offer opportunities for the revitalization of an economically depressed area, reclamation of lands previously surface mined and improvement of the water quality. The obvious benefits of lower taxes and more jobs should be weighed. In addition, the numbers used to illustrate the cost of operating a coal fired plant and the environmental impact of its operation should be based upon the operation of an anthracite fired plant.

The report does indicate that at the operating license stage, considerations of alternatives involves only the decision as to whether the plan should operate or not. However, as can be seen from the projected reserve margins shown in tables 7.4 and 7.5, the operation of the Susquehanna station as a nuclear plant will preclude the need for an anthracite facility for many years to come and will therefore preclude the possibility of the area receiving the benefits that would be associated with such a plant. A full discussion of this alternative should be included.

- 6) The benefit-cost analysis should, of course, be affected by all the above comments. In addition it is interesting to note the inclusion of a decommissioning cost of 59 million dollars. Is this an estimate based on a realistic plan for decommissioning? In light of the estimated \$400 million to "clean up" Three Mile Island Unit II, it seems unrealistic to expect to be able to decommission two units for the stated price. An outline of the expected method of decommissioning should be included.

The benefit-cost analysis does not include any information with regards to the psychological effects on the residents of the area if the plant is allowed to operate. Surveys at a business located near the plant showed that 50% of the employees would quit their jobs if the plant was allowed to operate. Many area residents have already begun to make plans to leave the area. An analysis of these effects should be included.

The benefit-cost analysis also assumes that the production of 2100 MW of electrical energy is enough to offset the accumulated costs. This assumes that the additional capacity is needed. However, tables 7.4 and 7.5 seem to indicate that without the operation of the plant there would still be sufficient reserves to meet both the requirements of the interchange agreement and the recommendations of the Federal Economic Regulatory Commission. Therefore, the benefit of the additional power seems questionable.

- 7) In the July 23 Federal Register there was a notice that listed the Nuclear Regulatory Commission as one of those agencies that had not published proposed procedures to bring them in alignment with the new National Environmental Policy Act regulations adopted by the Council on Environmental Quality and effective July 30, 1979. It is our assumption, then, that this draft of the environmental statement may not follow these new regulations and we feel the commission should publish their proposed procedures and have them approved prior to releasing the final version of this report.

As we stated above, we are going to continue research on these topics. With the anticipated extension to the review period and the help of various local agencies we hope to more completely evaluate the draft environmental statement. In the wake of this country's worst nuclear accident it is, we feel, advantageous to provide as thorough an analysis as possible of the potential effects the operation of this plant could have on the environment.

Sincerely,



David Mann  
for The Susquehanna Alliance