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 Office of Nuclear Reactor Regulation

SUBJECT: Comments on DES & environ impact of meltdown should be considered in evaluating economic factors. Facility is economically uncompetitive w/alternate energy sources.

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Florence J. Shell
Thompson, Pa. 18465

August 18, 1977

To
US Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D. C.

REGULATORY DOCKET FILE COPY

Subject: Comments on the Draft Environmental
Statement related to operation of
Susquehanna Steam Electric Station
Units 1 and 2 of Pennsylvania Power
and Light Company and Allegheni
Electric Cooperative, Inc.
Nureg 0564

6.2 Postulated accidents involving Radio-
active Materials.

This section should be updated
in the light of TMI-2 accident.
Hypothetical sequence of failures more
severe than Class 8 should be considered

since human frailty and fallibility
cannot be eliminated the worst possible
accident is a possibility, the unthinkable
could happen. Therefore the environmental
impact of a meltdown should be
considered in the costs. COE 8/10

I object to the conclusion that "environ-
mental risks due to postulated
radiological accidents are exceedingly
small and need not be considered further"

7908240535

The NRC's own monitoring of radioactive fallout around TMI-2 out to 10 miles during the week of March 31 - April 7, 1979 and readings taken by Dr. Chauncey Hepford, upwind of the plant during that same time, indicate that the fallout did not diminish with the distance from the plant but in some instances (the N.E. sector, I believe) actually increased. Dr. Califano's calculation of projected deaths was based on a hypothetical model not on the actual NRC data.

7.3.2 The staff concludes that economic considerations justify adding the Susquehanna facility in the scheduled time period.

The Susquehanna nuclear plant is economically uncompetitive with virtually any of the alternative sources of energy including conservation when life time full cost includes plant decommissioning, ultimate dismantling and site decontamination, interim spent fuel storage and subsequent

disposal, and radioactive waste management and disposal at all stages of the nuclear fuel cycle; and when government subsidies are counted in by the taxpayer for the Price-Anderson Act and Research and Development expenses.

4.5.5 Uranium Fuel Cycle Impacts

Radon-222

I refer you to the transcript of the TMI-2 Operating License Hearing July 5, 1977 page 2890 and the testimony of Dr. Chauncey Kefford and Dr. Reginald Gotchy. (*see over)

On September 20, 1977 Dr. Walter Jordan, a member of the N.R.C. Atomic Safety and Licensing Board, submitted a memo to the Board pointing out that the number of curies (74.5) the NRC attributed to radon-222 was far too low, by a factor of 100,000. Met Ed's lawyer moved on December 19, 1977 that the ASLB disregard

* Using the ARC's own data and computer models developed by the US Environmental Protection Agency Dr. Keppford calculated that over the full detoxification period the radon gas (from mill tailings alone) would result in millions dying prematurely of cancer, leukemia and other radiation-related diseases.

Hepford's testimony and the Jordan memo on the grounds that radioactive emissions from Radon-222 are insignificant compared with radon contribution of natural back ground radiation.

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"From this above analysis the staff concludes that both the dose commitments and health effects of the uranium fuel cycle are insignificant when compared with dose commitments and potential health effects to the U.S. population resulting from all natural back ground sources."

In rebuttal, Dr. Hepford pointed out that on the basis of NRC's own environmental health cost of \$1000 per man-rem, Dr. Jordan's calculation of 10 million man-rem exposure per reactor year translates into an environmental cost of \$10 billion per reactor year. On a purely cost benefit basis Met. ed. would have to sell TMI's electricity for \$2.00 per kilowatt hour to show a comparative profit.

These costs would be the same for P.P. & L. as for Met. Ed. coming as they do from the mining and milling of uranium.

I also object to the argument that costs are negligible because they are less than naturally occurring costs. The naturally occurring costs are bad enough without adding to them.

Respectfully submitted
Florence Z. Shelly
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