

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 7908270390 DOC. DATE: 79/08/20 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH. NAME THOMPSON, F. AUTHOR AFFILIATION
 RECIPIENT AFFILIATION
 Division of Site Safety & Environmental Analysis

SUBJECT: Comments on DES. Urges denial of ol. Facility is not needed & is unsafe.

DISTRIBUTION CODE: C002B COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: ENVIRON. COMMENTS.

NOTES: ~~SEND T&E 3 CUS. FSAR & ALL AMDTs. L.A. 1 CH EVERYTHING CORNL.~~

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID	CODE/NAME	LTTR	ENCL		ID	CODE/NAME	LTTR	ENCL
ACTION:	05	PM P LEECH	1	1	AD	17	BC EPB #2	1	1
	18	LA EPB #2	1	1			MOORE	1	0
INTERNAL:	04	REG FILE	1	1	02	NRC PDR	1	1	
	07	I&E	2	2	09	ENVN SPEC BR	1	1	
	10	CST BNFT ANL	1	1	11	TA/EDO	1	1	
	12	AD SITE TECH	2	2	14	ACDENT ANALY	1	1	
	15	EFLT TRT SYS	1	1	16	RAD ASMT BR	1	1	
	19	DIR DSE	1	1		AD ENVIRON TECH	1	0	
EXTERNAL:		AD SITE ANALY	1	0		OELD	1	0	
	03	LPDR	1	1	04	NSIC	1	1	
	20	NATL LAB ANL	5	5		ACRS	1	0	

LTV
 LWR
 LWR #3 BC
 MINER
 LWR #3 LA

AUG 29 1979

1 ENCL
 4

TOTAL NUMBER OF COPIES REQUIRED: LTR 28 ENCL 25

730 East Second Street
Bloomsburg, PA 17815
20 August 1979

Director, Division of Site Safety and
Environmental Analysis
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

The following comments concern the Draft Environmental Statement for PP&L's Susquehanna Steam Electric Station, Units 1 and 2.

I urge the denial of an operating license for the PP&L nuclear power plant for the following reasons:

1. Need

a. the projection of the PJM summer peak (Table 7.5) shows a 6% increase: the national average is, in actuality, slightly over 2%, a more reasonable projection and one that decreases need, pushing back the drop in reserve over summer peak.

b. while needs of the PJM power grid are a main reason given for the need to build the PP&L nuclear power plant (SS 1 & 2), those needs can be bypassed and PP&L can sell direct to member companies (e.g., sales to GPU to replace TMI electricity). PP&L's growth alone, with a generating capacity in excess of 41% over peak demand (Table 7.4), does not show conclusive need for more generating capacity by 1981, especially if the strong conservation measures of the service area continue. In fact, if the need were real, PP&L would be obliged to conduct a crash program to build a coal/solid waste/solar (or what-have-you) plant, since the nuclear plant may very well not be in operation by then.

c. the statement that "additional reserve capacity above 20% may be desirable for a system with units which are large in relation to system size (as will be the case with ~~the~~ the Susquehanna facility in service)," (p. 7-5) rather than showing the need for the plant, shows that the plant, in fact, creates need.

REGULATORY DOCKET FILE COPY

2. Evaluation of the Proposed Action

In reaching the conclusion that the nuclear power cycle is less harmful to man than the coal cycle, insufficient attention was paid to the mounting evidence of the effects of low-level radiation; the unknown effects of radioactive waste disposal; and the reliability of evidence supplied almost entirely by the nuclear power industry. While measurable effects may, at present, point to the coal cycle as more harmful, the potential for harm renders the nuclear cycle the more destructive.

7908270390

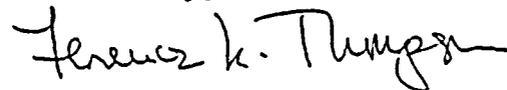
002/10

3. Benefit-Cost Analysis

- a. The benefit of 11.0 - 12.9 billion KWh of electric power to the PJM interchange is based on a not necessarily valid assumption of a plant capacity factor of 60-70%, when, in actuality, nuclear power plant performance averages less than 60%.
- b. The addition of 1890 MW of generating capacity to the PJM interchange and 210 MW to the cooperative is listed as a benefit when, in reality, it might be construed as a cost since it may encourage additional electrical power use.
- c. The "savings" of 75 million (1980 \$) in production costs per unit per year can be challenged if total costs, including government subsidies of the nuclear power industry, are included. In more concrete terms, the "savings" would accrue only if radioactive waste disposal is not pro-rated into the costs, and if the plant operates at 60-70% efficiency, without accident, for its projected lifetime: there are no models that would lead to the belief that this will happen.
- d. The conclusion that there are no significant socioeconomic costs to be expected from station operation does not give sufficient weight to the very real stress experienced since TMI by those living in a 20 mile radius of the plant--the constant feeling of living on the edge of a radioactive volcano will cost.
- e. The economic costs are presented in absolute terms rather than as compared to not operating the plant. Calculations from sources other than the utility have not been taken fully into account: Komanoff, e.g., projects electricity generated from coal-fired plants as cheaper now than from nuclear--and the difference will increase.

In summary, I urge the Nuclear Regulatory Commission to deny an operating license to PP&L for Susquehann Steam (Nuclear) Electric Station, Units 1 and 2, because operating the nuclear plant will adversely affect me, as a PP&L consumer, economically, environmentally and emotionally, and because, the need for additional generating capacity having diminished, there is enough "lead time" to develop alternate energy sources (including the use of increased conservation and efficiency) to supply the electricity needed--in an economically, environmentally and emotionally acceptable manner.

Sincerely,



Florence Thompson (Mrs. L.F.)