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Winfield, Pa. 17889
August 29, 1979

Mr. Daniel Muller, Director
Division of Site Safety and
Environmental Analysis
Nuclear Regulatory Commission
Washington, D.C. 20555

50-387

REGULATORY DOCKET FILE COPY

Dear Mr. Muller:

Thank you for the opportunity to comment on the "Draft Environmental Statement related to Operation of Susquehanna Steam Electric Station, Units 1 and 2 Pennsylvania Power and Light Company, Allegheny Electric Cooperative, Inc." Dockets Nos. 50-387, and 50-388, June 1979. Since no suspense date was mentioned in the document, it can be assumed that comments are still being accepted.

My comments will be very brief due to the limited amount of time available to review the document. Despite being published in June, not all of the public in the area affected by the plant were made aware of the document. Efforts by local environmental groups to alert the public, such as myself, were successful, but that did not occur until mid August. The apparent efforts of the NRC were the minimum that is required to do in order to seek input. This symbolizes NRC's attitude in the entire "public input" process- do the minimum required just to satisfy a section of the law. The public be damned for the convenience of the NRC and utilities. Hopefully this attitude will not carry over into the operation and regulation of a nuclear power plant.

Regarding the document itself, it is unconscionable that an environmental impact statement on a nuclear power plant published after April 1979, does not include specific analysis of the potential similar problems as occurred at the Three Mile Island nuclear facility. Plant design differences aside, there are many generic issues such as emergency preparedness that should be factored into the impact of SESS. Emergency preparedness for an 80 km radius area costs a lot of money and time, and such costs should be factored into any cost/benefit discussion of SESS. The impact on the residents of the TMI area (16km, not just the 8km under study) of radiation exposure, stress and its related effects, and other health consequences should be carefully evaluated before SESS is permitted to continue in the licensing procedure.

General comments on specific sections of the document are as follows. On page 4-2, the possible effects of low river flow and excess river flow (floods) make one concerned about the assumptions used to draw the conclusion that the plant would need to be shut down only four days per year. An adequate water supply is crucial to reactor safety, therefore the assumptions should be more fully explained.

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Table 4.12 on page 4-21 indicates that the nearest sport fishing location is 24 hr. transit time away. Fishermen can be found at most points along the river from 0.1 hr. away on to the Chesapeake. Perhaps the problem is definitional.

The statements in Section 4 which state that radioactive releases, both occupationally and environmentally, will have no significant environmental impact are misleading when one considers: that the effects of low level radiation are unknown. Groups such as the National Academy of Sciences hesitate to place acceptable low dose limits on human health effects.

Table 6.2 should be revised to reflect the experiences gained from TMI. Class 9 postulated accidents should be considered in calculating the costs and benefits of the plant to the people in the area. Their chance may be small in the NRC's opinion, but the consequences are real and the price must be paid if a class 8 or 9 accident occurs.

Section 7 "Need for Plant" fails to document the need for the plant other than to provide excess capacity. The reserve margin far exceeds recommended levels. The projections probably fail to consider recent shifts to conservation and selected solar hot water projects due to the high costs of electricity. Such trends, including residential winterization, will continue as the costs of electricity increase. Therefore, building a plant to provide increasing excess capacity escapes logic. The need for the plant is not documented by this analysis.

Section 8.41 "Health Effects", comparing nuclear and coal fired plants failed to include, as previously mentioned, the effects of a class 9 accident. We now realize after TMI, that serious accidents are in fact a possibility and should be considered.

The tables in Section 8 dealing with the effects of coal versus nuclear plants presumably used coal in the general sense. The SESS is located near the heart of the anthracite coal region. Anthracite, because it is a cleaner burning coal, has been exempted from many EPA air pollution regulations. Since this is the coal that should be used at SESS, it is the coal that should be used in any comparative studies.

Section 8.4.4 mentions that there have been no serious accidents in a nuclear plant with which to study morbidity and mortality. As mentioned previously, TMI has taken the first painful step towards this experience. That experience should be carefully studied before the nuclear process continues.

Section 8.5 fails to take into consideration a reported recent GAO study indicating that DOE may be off by as much as twenty percent in their estimates because of production losses and the declining quality of the ore were not considered. This section should be revised in light of the GAO report.

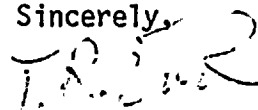
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Section 8.6 "Decomissioning" is treated lightly considering the tremendous impact a non functioning radioactive plant can have on the environment. Storage for thousands of years with unproven technologies deserves more consideration in an environmental impact statement. Along with decomissioning, waste storage and disposal deserve more detailed analysis as they have a direct impact on the health of the people in the area.

In conclusion, the need for the plant versus the impact of the plant does not justify that any further work be done at SESS. When need is documented, and the alternatives for northeast Pennsylvania better examined (conservation, solar projects, biomass, small hydro projects, etc.) then a better and more complete environmental impact statement should be prepared. At that point in time, and not before, nuclear power should be considered as an alternative.

Thank you.

Sincerely,



Thomas R. Duck

cc: Senator Schweiker
Senator Heinz
Representative Flood
Representative Ertel

