NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)

CONTROL NO: 6003
FILE: Enviro

FROM:	DATE OF DOC	DATE REC'D	LTR	TWX	RPT	OTHER
J.D. Garcia Tucson, Az	6-3-75	6-9-75	xxx			

TO:	ORIG	CC	OTHER	
NRC	1-signed			SENT AEC PDR xx SENT LOCAL PDR xxxx

CLASS	UNCLASS	PROP INFO	INPUT	NO CYS REC'D	DOCKET NO:
	xxxxx			1	STN- 50-528, 529, and 530

DESCRIPTION:

Ltr furn comments on the DES concerning Palo Verde Nuclear Generating Station Units 1,2 and 3 .....

ENCLOSURES:

ACKNOWLEDGED
DO NOT REMOVE

PLANT NAME: Palo Verde 1 thru 3

FOR ACTION/INFORMATION 6-9-75 JGB

BUTLER (L) W/ Copies	SCHWENCER (L) W/ Copies	ZIEMANN (L) W/ Copies	✓REGAN (E) W/ Copies
CLARK (L) W/ Copies	STOLZ (L) W/ Copies	DICKER (E) W/ Copies	LEAR (L) W/ Copies
✓PARR (L) W/ Copies	VASSALLO (L) W/ Copies	KNIGHTON (E) W/ Copies	SPEIS W/ Copies
KNIEL (L) W/ Copies	PURPLE (L) W/ Copies	YOUNGBLOOD (E) W/ Copies	LICENSING PROJECT MANAGER W/ Copies

INTERNAL DISTRIBUTION

REG FILE	TECH REVIEW	DENTON	LIC ASST.	A/T IND.
✓NRC PDR	SCHROEDER	✓GRIMES	R. DIGGS (L)	BRAITMAN
✓OGC, ROOM P-506A	2 MACCARY	✓GAMMILL	H. GEARIN (L)	SALTZMAN
✓GOSSICK/STAFF	KNIGHT	✓KASTNER	E. GOULBOURNE (L)	MELTZ
CASE	PAWLICKI	✓BALLARD	P. KREUTZER (E)	
GIAMBUSSO	SHAO	✓SPANGLER	J. LEE (L)	PLANS
BOYD	STELLO		M. MAIGRET (L)	MCDONALD
MOORE (L)	HOUSTON	ENVIRO	S. REED (E)	CHAPMAN
DEYOUNG (L)	NOVAK	MULLER	M. SERVICE (L)	DUBE (Ltr)
SKOVHOLT (L)	ROSS	DICKER	S. SHEPPARD (L)	E. COUPE
GOLLER (L) (Ltr)	IPPOLITO	KNIGHTON	M. SLATER (E)	PETERSON
P. COLLINS	TEDESCO	YOUNGBLOOD	H. SMITH (L)	HARTFIELD (2)
DENISE	✓J. COLLINS	REGAN	S. TEETS (L)	KLECKER
✓REG OPR	LAINAS	✓PROJECT LDR	G. WILLIAMS (E)	EISENHUT
FILE & REGION (2)	BENAROYA	REVANS	✓V. WILSON (L)	WIGGINTON
MPIC	VOLLMER	✓HARLESS	R. INGRAM (L)	
STEELE			✓N. McNEAN	Env (4)

EXTERNAL DISTRIBUTION

✓1 – LOCAL PDR Phoenix, Az		
✓1 – TIC (ABERNATHY) ~~(6)(2)(10)~~	NATIONAL LABS ANL	1 – PDR-SAN/LA/NY
✓1 – NSIC (BUCHANAN)	1 – W. PENNINGTON, Rm E-201 GT	1 – BROOKHAVEN NAT LAB
1 – ASLB	1 – CONSULTANTS	1 – G. ULRIKSON, ORNL
1 – Newton Anderson	NEWMARK/BLUME/AGBABIAN	1 – AGMED (RUTH GUSSMAN) Rm B-127 GT
– ACRS HOLDING/SENT		1 – J. D. RUNKLES, Rm E-201 GT

June 3, 1975

U.S. N. R. C.
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

Docket No. STN 50-528, 529 + 530

Gentlemen:

We would like the following comments to become part of the record concerning the Draft Environmental Statement related to construction of Palo Verde Nuclear Generating Station Units 1, 2 and 3, Docket Nos. STN 50-528, 529 and 530.

The construction of these generating units is, at this time, premature. The safety of reactor operation, fuel transportation, waste transportation and storage remains a subject of great controversy. This draft, in section 7, treats the subject as non-controversial. The only reference for section 7 is the WASH 1400 draft. We believe that other, perhaps more objective, viewpoints should be considered.

For example, the American Physical Society initiated an independent reactor safety study a year ago. Some of the conclusions of this study, reported at the APS meeting in Washington, D.C. on April 28-May 1, 1975, differ from those in the WASH 1400 draft. This would affect some entries in tables 7.2 and 7.3. We would like to see this information taken into account.

Since the case for nuclear reactors is not clear-cut, we feel that an overwhelming need for power must be demonstrated before such plants are constructed. This need must be one dictated by the basic welfare of society; not merely by the desire for conveniences. Such a need has not been demonstrated for the immediate future.

Section 8.3 considers various influences which would alter (invariably reduce) the historic growth rate of electricity demand. Indeed, they concede that in the past year, the growth rate has been drastically reduced. In 8.3.2.3, it is implied that there is a consensus that a change in rate-structure will reduce the consumption rate. However, since all studies do not yield a unique model for predicting the decrease, they reject this particular influence on demand.

6003

Indeed, their projections ignore all of these considerations and use the historic-projection method. Then, despite the use of the business-as-usual growth rate, we come to table 8.19 which shows the Reserve Margin With and Without a Two-Year Delay in Palo Verde Units 1 and 2. The magic number for reserve margin is 15%. With the two-year delay, the margin dips below this (arbitrary) minimum only twice by 1985. Without the delay, the margin is nearly double the minimum in two years before 1985. We do not feel that an 17% dip below the minimum really constitutes a grave threat to society, when there are so many factors which would mitigate the upper-bound demand figures used by the applicant.

Two more comments are in order. An important factor in the projected demand is the construction of the Central Arizona Project (CAP). This project itself has generated considerable controversy and it is not yet certain that it will be completed. It would be irresponsible to ignore the CAP in planning for power needs. On the other hand, the fate of CAP should be much more certain in two years and, as we have observed, the risk involved in a two-year wait is not excessive. It would be equally irresponsible to overcapitalize on the basis of a project which is terminated.

Finally, the margin is predicated on peak demand. We feel that the alternatives leave out one plan which is significant to a system whose load factor is 58%. (This plan has, however, been circulated by the local press.) That plan is pumped water storage. The water now committed for cooling purposes could be pumped to an elevated reservoir during off-peak hours and then allowed to flow through the turbines in the reverse direction during peak hours.

Sincerely,

J. D. Garcia

R. M. Emrick

J. D. Garcia
5141 E. Hawthorne
Tucson, Arizona 85711

Roy M. Emrick
2220 N. Norton
Tucson, Arizona 85709