

Safe Haven, Ltd.

PR-50,51

November 12, 1979

Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing & Services Branch



Dear Mr. Chilk:

Safe Haven, Ltd. respectfully requests to participate in the Nuclear Regulatory Commission's waste confidence rulemaking proceeding noticed on October 19 by the Commission to generically assess the degree of assurance now available that radioactive wastes can be safely disposed of, to determine when disposal or off-site storage will be available, and to ascertain whether radioactive wastes can be safely stored on-site past the expiration of existing facilities' licenses until off-site disposal or storage is available.

Safe Haven is a grassroots organization based in Sheboygan with a paid membership of approximately 500 individuals from diverse livelihoods. Primarily because the government has failed to develop a safe method for isolating highly radioactive wastes from our human environment, Safe Haven opposes the licensing of a nuclear power plant proposed to be built at Haven in northern Sheboygan County. We encourage the application of environmentally-compatible energy sources, including "wasted energy". In pursuing our goals, we have initiated education and citizens action programs.

Within our citizens action program, we have intervened before the Public Service Commission of Wisconsin in its review of the utilities' long-range plans to build electric generation facilities in our State and to oppose the licensing for construction of the nuclear plant slated for our area. We have also intervened before the NRC regarding said Haven facility and the compaction of spent fuel at existing plants in Wisconsin. During all our interventions, we have stressed the geological, technical, social and political uncertainties pertaining to the disposition of highly radioactive wastes. Though we are hopeful that a sound radioactive waste management program will be developed and implemented by the federal government, we realize that there is no assurance whatsoever that the spent fuel currently stored at the plants will ever be removed for final disposition. We do not want these highly radioactive wastes to remain a burden or a threat to the well-being of future generations. And, we view as pure folly,

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totally irresponsible, and immoral the licensing of additional nuclear power plants until a solution for isolating highly radioactive wastes from our environment is in operation.

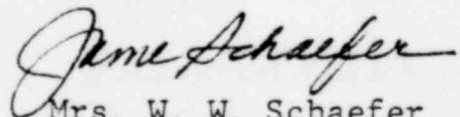
Thus, we welcome this NRC rulemaking proceeding and urge the Commission to compile a complete record, review it carefully, and issue a substantive rule based on fact rather than pure speculation. We particularly encourage the Commission to:

- (1) Thoroughly examine the conditions of spent fuel storage at all currently-licensed nuclear plants in the United States, documenting storage problems (e.g., leakage from stainless steel pool liners, swelling racks, defective fuel elements), determining the ability to remove spent fuel from any plant to another location in the event that on-site storage poses a threat to the people in the area, and ascertaining exactly how long spent fuel can be stored underwater at each plant;
- (2) Gather all available scientific evidence pertaining to the containment of highly radioactive waste in geological environments and determine a realistic time frame during which the accumulation of sufficient data to assure containment of the wastes in a chosen geological repository can be expected; and
- (3) Cautiously estimate the amount of time required to obtain concurrence from officials in a State where a potential repository exists that wastes can be safely handled and stored.

In this proceeding, we will offer a type of technical expertise so desperately needed -- common sense. We will also submit information on the status of spent fuel storage at the six nuclear power plants located around Lake Michigan.

We look forward to receiving the pre-hearing conference schedule.

Cordially,



Mrs. W. W. Schaefer
Director of Intervention
SAFE HAVEN, LTD.
3741 Koehler Drive
Sheboygan, WI 53081
414/458-9274

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