

Illinois Safe Energy Alliance

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Mr. Richard Goddard
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

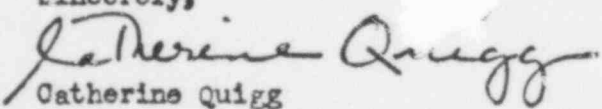
Dear Mr. Goddard:

This letter registers the objections of the Illinois Safe Energy Alliance, a coalition of twenty environmental groups, to the early installation of four racks at the Zion spent fuel storage pool prior to the NRC's final decision on compaction there:

1. Installing four new racks will expose workers to needless radiation if the NRC decides against the requested increase.
2. Because the new General Electric high density racks have a swelling defect, they are vented to allow the hydrogen gas causing the swelling to escape. The venting exposes the aluminium in the rack tubes to the pool water. The introduction of this new metal, aluminum, to the pool could speed up corrosion of the other racks and the stainless steel liner. Why should we take this unnecessary risk if we don't have to?
3. Premature installation of the racks is wasteful of ratepayers' money if the racks are eventually unused because of a negative decision by the Atomic Safety and Licensing Board on the requested increase.
4. The ASLB's final decision on increased spent fuel storage should not be prejudiced by the partial installation of the defective new compact racks.

Given the above considerations, I urge you on behalf of the Illinois Safe Energy Alliance to deny Commonwealth Edison Company their request to allow the premature installation of four new compact racks at the Zion nuclear station.

Sincerely,


Catherine Quigg
Co-Chairman
Illinois Safe Energy Alliance

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