



Director, Division of Technical Information
and Document Control
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Division Director:

I would like to comment on several statements in the draft environmental statement for the Callaway nuclear plant (Docket No. 50-483, NUREG - 0813) which seem misleading or incorrect. I am especially disturbed by section 5.9.2.2, "Accident Experience and Observed Impacts."

#1
On page 5-38, the following statement is made concerning plants licensed for operation: "Accidents have occurred at several of these facilities." On page 5-61, section 5.9.4.5 it is concluded that accidents are unlikely to occur. These claims, based on selected accidents in references 36 and 37, are gross understatements. Careful study of an ongoing data file made up of Licensee Event Reports, or the Bi-weekly Power Reactor Reports which are readily available in depository libraries shows that there have been "accidents" or reportable, abnormal occurrences not at several facilities, but at every single one. In 1980 alone, there were more than 3000 incidents, many releasing radiation into the environment. This was an increase of 65% over 1979. To say that "the experience base is not large enough to permit a reliable quantitative statistical inference" is false. Given the record of all other operating plants, Callaway I is guaranteed to have accidents.

#2
The second paragraph on page 5-38 attempts to minimize the severity of the accident at Three Mile Island. The fact that only part of the total radioactive iodine was released from the plant makes that part no less dangerous. A claim is made that no other radioactive fission products were released in measurable quantity. If this means that measurement was impossible because monitors were inoperable, I agree. I feel, however, that the statement is misleading. The Licensee Event Report for this accident (79-012/UIT-0) indicates that a mixture, not iodine alone, was released to the atmosphere. The amount of the release is an estimate, given as greater than 100,000 curies.

#3
On page 5-53, it is claimed that the principal cause of radioactive exposure to the public through groundwater would be a core-melt accident. Since 1969, there have been 79 releases of radioactive liquid into water, none resulting from core-melt accidents. The largest cause (in 32 cases) was personnel error. Fifty-seven of these accidents occurred in pressurized water reactors and the major cause of these, again, was personnel error. Emissions were made underground, into storm sewers, rivers, lakes, etc., and were also detected in samples of river sediment. The errors included valves left open, releases made without prior sampling, and incorrect calibration of monitors. What "line of defense" is there against people making mistakes? At Zion I on Aug. 10, 1980, a radioactive release was made into Lake Michigan that was 100 times the maximum permissible concentration because the liquid was not sampled. At Sargent I on May 18, 1980, a valve was inadvertently left open and a release was made into the river that was 10,000 times the maximum permissible concentration.

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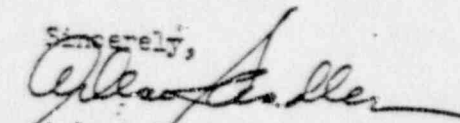
#4

On page 5-38, section 5.9.4.2, "Accident Experience and Observed Impacts," it is claimed that no accident is "known to have caused any radiation injury or fatality to any member of the public, any significant individual or collective public radiation exposure, or any significant contamination of the environment." According to the Licensee Event Reports, there can be no doubt that exposure has taken place. In terms of radiation injury or fatality, it is well known that cancer and genetic changes take years to develop. (p. 5-37)

#5

On page 5-37, the section called "Health-Effects Avoidance" suggests that contaminants are produced by severe accidents and can be avoided by restricting the use of contaminated property or food. Data, provided by the plants themselves, prove contamination has occurred in less than severe accidents. This data does not include contamination from routine emissions. Some accidental releases, while not severe, may not be easily corrected. At Surry 1, on Nov. 11, 1974, a release over the maximum permissible concentration was made into the James River. It was uncontrolled for 35 days. If such a release were to occur in the Missouri River as the result of an accident at Callaway, how easy would the "avoidance of the health hazard," i.e., drinking water, be on residents of St. Louis and St. Louis County?

Sincerely,


Arlene Sandler