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Sir:

Please accept the following letter as my comments on NUREG 0686 Draft Environmental Statement PRIMARY COOLING SYSTEM CHEMICAL DECONTAMINATION AT DRESDEN NUCLEAR POWER PLANT.

I saw this DEIS advertised for comment in the Federal Register. Since several nukes in the PA area will have to be similarly treated in the future, I ordered it for comment to see what the industry has in store for this area.

I was not disappointed. It is a totally deficient document.

Although there has been no similar treatments for nuclear power plants, there have been many similar cleanups for non nuclear power plants.

This document does not reference any of the problems that have been faced in refurbishing non nuclear power plants for elongated operating times. These problems have been large and many. Occasionally, the problems in cleaning and refurbishing non nuclear power plants have been so great that the effort was suspended and the plant retired. The problems included major leaks when the crud was removed; difficulties in removing blockage; formation of blockage due to saturation of cleaning solution; and many others that I cannot remember.

A good look at the problems involved in cleaning out a non nuclear power plant would probably turn the cost benefit equation around the other way. A poor cost/ benefit equation is indicated which would mean that closing down the facility is the best solution.

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