

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY

COMMONWEALTH EDISON COMPANY

Dresden Nuclear Power Station Unit 1

PETITION FOR PREPARATION OF
ENVIRONMENTAL IMPACT STATEMENT
AND FOR STAY

Now comes Petitioners, CITIZENS FOR A BETTER ENVIRONMENT and PRAIRIE ALLIANCE, both Not-for-Profit Corporations registered in the State of Illinois, and hereby petition the United States Department of Energy as follows:

1. Pursuant to the National Environmental Policy Act, as amended, 42 U.S.C. §4321, et. seq., the Atomic Energy Act, as amended 42 U.S.C. §2011, et. seq., the Council on Environmental Quality Regulations, 40 C.F.R. Parts 1500-1508, and 10 C.F.R. Part 208, Citizens for a Better Environment (hereinafter "CBE") and Prairie Alliance (hereinafter "PA") petition the United States Department of Energy to prepare an Environmental Impact Statement on the proposed chemical decontamination at Commonwealth Edison Company's Dresden Nuclear Power Station, Unit 1.

2. Petitioner CBE is an Illinois not-for-profit corporation with approximately 5,000 members residing in Illinois. CBE files this petition on behalf of its members who reside near the Dresden Nuclear Power Station, Unit 1 and whose health, safety and property may be adversely affected by any environmental impact of the chemical decontamination.

3. Petitioner PA is an Illinois not-for-profit corporation with approximately 350 members residing in Illinois. PA files this petition on behalf of its members who reside near the Dresden Nuclear Power Station, Unit 1 and whose health, safety and property may be adversely affected by any environmental impact of the chemical decontamination.

4. Petitioners and their members have a substantial interest in the proposed chemical decontamination at Dresden Unit 1 in that:

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(a) The Dresden station is located in the State of Illinois and is within 50 miles of several of the state's most populated areas including the Chicago Metropolitan area, Aurora and Joliet, in which a large portion of CBE's and PA's members reside.

(b) Any mishap or accident occurring during the proposed decontamination releasing radionuclides into the environment will adversely affect CBE's and PA's members in the vicinity.

(c) The Dresden station is located near the confluence of three major water resources, the Illinois, Kankakee and Desplaines Rivers; any release of radiation contaminating these waterways will adversely affect CBE's and PA's members.

(d) The members of CBE and PA desire to preserve the future environment of the area surrounding the Dresden station for themselves, their families and descendents.

5. The proposed chemical decontamination at the Dresden Nuclear Power Station, Unit 1 is a major federal action in that:

(a) The Department of Energy (DOE) funded approximately \$8.2 million of the cost of the proposed decontamination.

(b) DOE intends to monitor, assist, and receive reports on the proposed decontamination in order to use the techniques and information acquired in the proposed decontamination for future decontamination projects.

(c) The Nuclear Regulatory Commission (NRC) is reviewing the proposed decontamination.

(d) The NRC staff must review and approve the proposed decontamination prior to its commencement.

(e) The NRC staff must review and approve procedures for returning the reactor to service after the decontamination.

(f) The NRC intends to use the information acquired in the decontamination as a basis for reviewing and approving any future large scale reactor system decontamination projects.

5. The proposed decontamination at Dresden Unit 1 significantly affects the human environment in that:

- (a) The proposed action is the first large scale decontamination of a commercial nuclear plant;
- (b) Radionuclides may be released to the environment during the decontamination;
- (c) Radionuclides may be released to the environment during storage, transportation, and disposal of the radioactive "crud" removed from the reactor during the decontamination;
- (d) The chemical solvent used to decontaminate the reactor may on its own or in combination with radionuclides adversely affect the environment if it is not properly handled, stored, transported and disposed of;
- (e) Studies have shown that storage and disposal of radionuclides so treated pose a greater threat to the environment and public health than other comparable low, intermediate and high level radioactive wastes;
- (f) The method used in the decontamination (including but not limited to the nature of the solvent, the nature of the chelating agent, the acidity or alkalinity of the decontamination solution, the temperature of the decontamination solution during the actual treatment, and the length of time the decontamination solution comes in contact with the affected pipes) may weaken or impair the integrity of the reactor's pipes and cooling system, thereby creating health and safety hazards;
- (g) The proposed decontamination may increase exposure to radiation, toxic chemicals and known or potential carcinogenic compounds for workers and others near the facility, near the storage and disposal sites and for those involved in the transportation of the decontamination mixture, before and after its use at the facility.

7. In a petition of March 19, 1979, Kay Drey of University City, Missouri, requested an Environmental Impact Statement, which the NRC treated as a request for action under 10 C.F.R. 2.206. Pursuant to 10 C.F.R. 2.206 (b), action on such requests is to be taken "within a reasonable time." In light of the delay since that request, CBE and PA urge the NRC to take action on this petition as well as Kay Drey's petition as soon as possible.

WHEREFORE, Petitioners, Citizens for a Better Environment and Prairie Alliance, request that the Department of Energy prepare and Environmental Impact Statement on the proposed chemical decontamination of Commonwealth Edison's Dresden Unit 1 and to stay said decontamination until it is prepared.

Respectfully submitted,

CITIZENS FOR A BETTER
ENVIRONMENT

PRAIRIE ALLIANCE

By: Robert Goldsmith

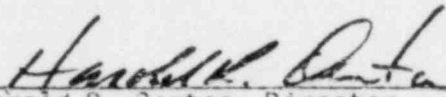
ROBERT GOLDSMITH
Their Attorney
59 E. Van Buren Street
Suite 1600
Chicago, Illinois 60605
312/939-1530

13 March 1980

impact statement should be prepared because of significant interest and concern expressed by members of the public. The staff has by separate action issued a Draft Environmental Statement. The requests of Ms. Drey and Mr. Goldsmith are, therefore, granted. The public hearings requested by Ms. Shineflug were predicated on the lack of assurance that the NRC would issue an environmental impact statement. Since the NRC has issued the statement, such hearings will not be necessary.

Copies of the Director's Decision, and the staff's response to the petition (Appendix A) enclosed thereto are available for inspection in the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C. 20555 and at the Morris Public Library, 604 Liberty Street, Morris, Illinois 60451. The Draft Environmental Statement may be examined in these locations. A copy of the decision and Appendix A will also be filed with the the Secretary for the Commission's review in accordance with 10 CFR 2.206(c) of the Commission's regulations.

In accordance with 10 CFR 2.206(c) of the Commission's regulations the decision will constitute the final action of the Commission twenty (20) days after the date of issuance, unless the Commission on its own motion institutes a review of this decision within that time.



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland
this 26th day of June 1980