

State of Wisconsin/Department of Administration

July 8, 1980

Lee Sherman Dreyfus
Governor

Kenneth E. Lindner
Secretary

Dr. Robert Geckler
Environmental Project Manager
Division of Site Safety &
Environmental Analysis
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Final environmental impact statement by Docket #50-409 U.S. Nuclear
Regulatory Commission, La Crosse Boiling Water Reactor

Dear Dr. Geckler:

We have reviewed the final EIS on the boiling water reactor of Dairyland Power
Cooperative at La Crosse. We offer the following comments:

1. A draft EIS on this matter was reviewed in 1976. Appendix D of the final
EIS describes (on one page) two additions to the on-site spent fuel
storage pool: in 1976 the capacity was increased from 84 to 134
assemblies; in 1978 it was increased to 440 assemblies. Neither of these
modifications apparently required an environmental impact statement and
the changes were approved by the Atomic Safety and Licensing Board.
 - a) An increase of 424% (84 to 440) in spent fuel assemblies being stored
at La Crosse is not a minor action and, as such, should have received
at least full explanation and documentation in the final EIS.
 - b) Paragraph two of the 1978 description regarding the age of the fuel
assemblies is unclear. Are only assemblies over three years old to
be stored in the pool? Where are "younger" assemblies to be stored?
2. The energy demand forecasts (pages 8-5 to 8-8) lead one to conclude that
the plant may not be necessary. The amounts of existing reserve
capacities are not clear from the presentation.
3. The plant is located on the Mississippi River: the EIS does not show how
users of the river might be warned in the event of an accident at the
plant. Nor does the report state how dairy farmers and residents of the
land area nearby might be warned of possible air or water contamination
affecting crops, dairy products or human health.

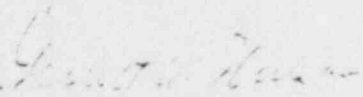
002/10

Dr. Robert Geckler
July 8, 1980
Page 2

4. The radiological impacts are measured against a nationwide standard. Perhaps a regional standard should be applied to Wisconsin because of this state's heavy economic reliance on food production and tourism industries.

We appreciate the opportunity to comment upon this document.

Sincerely,



Garrett A. Nielsen
Environmental and Economic Development Planning
Division of State Executive Budget and Planning

GAN:tab/7922A

cc: Atomic Safety and Licensing Board
Mr. Robert Halstead, State Division of Energy
Ms. Sally Jenkins, Public Service Commission
Mr. Mark Bunge, Radiation Protection Council
Mr. James Leverance, Department of Natural Resources