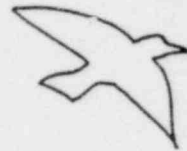


RPF Ecological Associates
727 Reba Place
Evanston, Illinois 60202



July 17, 1980

Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

I am enclosing the following comments on NUREG-0686, draft environmental statement related to primary cooling system chemical decontamination at Dresden Nuclear Power Station Unit #1, Commonwealth Edison Company, Docket No. 50-10.

I have several reservations about this draft environmental statement that are listed below:

1. I could not find an evaluation of occupational or public radiation exposure that might result from a serious vehicle accident during transportation of the solidified waste to a licensed burial facility. What is the probability factor of such an accident? If barrels were broken and solidified waste were spread onto a highway in a worst-case accident, what would be the level of public radiation exposure? Certainly the risks involved of such an accident should be evaluated as part of potential, although unlikely, radiation exposure.
2. On page 15 of Appendix A, it is stated that decontaminations of Canadian and British reactors indicate no evidence for an accelerated recontamination or crud deposition rate. Were these reactors decontaminated with Dow NS-1? How many years of reactor operation have passed since decontamination of those reactors? Were these contaminations on primary cooling systems? Have these reactors been free of pipe structural problems years later?
3. In the evaluation of the Impact of Alternatives, the option to shut down the reactor permanently seems to be inadequately considered. Will the reactor really be available as much as 60% over the next 15 years? What is the basis for computing a cost of \$100,000 per day for purchasing replacement power? Is this the going purchase price? Would electrical generation by coal, by oil, or by gas result in a cheaper power alternative? If even 20 million dollars would be spent to encourage electrical conservation, would there be a need to replace the power at all?

Please send me the final EIS when it is available.

Sincerely,

Robert W. Guth, Ph.D.
Ecologist

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