

Paula J. Ayers
7036 Bruno Avenue
St. Louis, Mo. 63143
July 8, 1980

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

Dear Sir:

I have read the draft environmental statement related to primary cooling system chemical decontamination at the Dresden Nuclear Power Station Unit No. one and the following comments:

- 1) Because of the admittedly temporary nature of the barrels you suggest for containing the solidified wastes (1-10 years) the only realistic long-term containment of the wastes you present is the polymer they will be trapped in and the ground.
- 2) The set polymer is porous, you do not know the leach rates. The slightly better leach rates with the Dow polymer shown in Dow's own tests doesn't seem to be sufficient assurance when the polymer and the ground are the only containment for these dangerous wastes.
- 3) Your response to problems of leaching to the water table by burying it in "dry" areas is not very reassuring. Recent flash floods in Pheonix and the possible climatic impact of the eruption of Mt. St. Helens point up the unpredictability of long-term climatic forecasts. It doesn't seem safe or thorough to use containment methods that only work in proper weather.
- 4) I find it difficult to believe or understand why radioactive elements other than Cobalt-60, such as radioactive Iron-59 and Nickel-63 are of no concern to you. I understand they have half-lives considerably longer than Cobalt-60 and would be dangerous much longer than the 50 years the polymer is hoped to last.

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There appear to be many uncertainties and real dangers involved in this procedure that could have a tremendous effect on the people near the Dresden plant and all over the country as well as the children of the future who may well pay the price for your haste.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Paula J. Ayers".

Paula J. Ayers