



REGULATORY DRAFT FILE COPY

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

Re: Docket No. 50-10

COMMENTS OF THE STATE OF ILLINOIS ON  
DRAFT ENVIRONMENTAL STATEMENT, NUREG-0686

The PEOPLE OF THE STATE OF ILLINOIS, by WILLIAM J. SCOTT, Attorney General of the State of Illinois, submit the following comments on the Draft Environmental Statement relating to the Primary Cooling System Chemical Decontamination at Dresden Nuclear Power Station, Unit No. 1.

I. The Selection of a Solvent

The formation of the NS-1 solvent is stated to be proprietary and thus is not disclosed. This prevents the reader from making even a cursory evaluation of the possible side effects, residue, vapors, corrosive nature of the solvent, etc. In addition, the planned operating condition for the NS-1 solvent (100 hours at 250°F) is not justified as being optimum and is not directly compared with other solvents.

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The selection process used by Commonwealth Edison used generalized criteria (e.g., "slow corrosion" and "greatest possible reduction in radiation levels") rather than specific values, so it is difficult to determine if any solvent really met their absolute requirements.

The choice of NS-1 may be justified but the Draft Environmental Statement does not indicate why. One reason is that NS-1 is not listed in Tables 4 and 5, so its effectiveness compared to the others cannot be readily discerned by the reader.

Thus, the Draft Environmental Statement does not justify the use of NS-1 since its selection process, formulation and capabilities are not adequately revealed in the document.

## II. Predictions and Criteria

The Environmental Statement fails to document the specific criteria for the decontamination process and results. For example, what is considered an acceptable corrosion rate; What is the solvent selection criteria for radiation reduction; What final radiation levels are required for safe operation and inspection?

If the processes are as predictable and proven as the Applicant believes, then it should be possible to make some reasonable predictions for inclusion in the decision base of the Environmental Statement. What is the effect on the conclusion reached in the Environmental Statement if, for example, the process is only half as effective and creates twice the exposure and twice the waste? Without specifically defined estimates and cri-

teria, the Environmental Statement is a blanket endorsement of an open-ended process.

### III. Pre-operational Testing

The Environmental Statement states that they expect the process to have minimal effect on the welds in the primary loop. There are some accessible welds which can be inspected to verify that no damage has been done and thus justify not inspecting the few inaccessible welds and components. What the Environmental Statement does not consider is the contingency consideration of what will be done if the inspected welds show signs of damage after the decontamination. What action will then be taken regarding the inaccessible welds and components?

There is very little information provided on the plans for the inspection and testing after the decontamination and system modifications are completed. The plans and suitable acceptance criteria for this review should be documented and should be part of the basis for the Environmental Statement.

### IV. Wastes

There are unique aspects of the wastes to be produced, such as the chelating agents, other chemicals of the concentrated solvent (undisclosed in the Environmental Statement), and the characteristics of the Dow Chemical solidifying agent which are not fully considered in the Environmental Statement.

The Staff response to Question 5 of Ms. Drey (Environ-

mental Statement, Appendix A, page 8) implies that the waste should be buried at least 10 feet from other wastes. It is not clear if this is just good practice or if the solidified waste and/or the solidifying agent are susceptible to damage by some types of waste materials.

In the discussion of barrel corrosion rates, the Staff quotes worst-case corrosion rates where the barrels would corrode through in less than a year and other environments where they may last 10 years but there is little or no evidence provided that the barrels will remain intact for the 50-100 years needed for decay of Co-60 (half-life 5.3 years). In addition, the Staff says the leach rate for Co-60 is higher in the Dow solidifying agent than in concrete. Thus, the proposed waste storage process seems exceedingly dependent upon the arid climate of the storage site for its acceptability.

#### V. Items Not Addressed

One of the most obvious missing elements is the plan and review of a pre-operational testing and inspection program. There must be suitable acceptance criteria; but this is not addressed in the Environmental Statement.

#### VI. Conclusions

The Environmental Statement is written as if the proposed decontamination process is an everyday occurrence with no unproven steps. It is true that some tests have been run but this is the first commercial U.S. reactor to utilize a decontamination tech-

nique to extend the useful plant life for 10 or 15 more years.

The Environmental Statement is too brief and contains little hard data. The responses to questions raised by individuals reflect an after-the-fact analysis which tends to justify a decision already reached rather than openly consider the issue raised.

Thus, there is not enough information or serious analysis in the Draft Environmental Statement to justify the Staff's conclusion that ". . .the benefits of this action outweigh the impacts associated therewith and the proposed decontamination will not significantly affect the quality of the human environment."

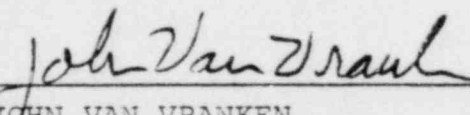
(Environmental Statement, Part 6.0)

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

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