

739 Hillcrest
DeKalb IL 60115
July 19, 1980

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

Dear Licensing Director:

Please accept my comments on NRC's Draft Environmental Statement for Decontamination of Dresden I Nuclear Power Station. It reads more like a promotional from the utility than a dispassionate appraisal by a neutral government agency. There appears throughout enthusiastic, uncritical acceptance of each of the utility's claims, "tests" and promises.

An outstanding example is the repeated assurances that the waste from the so-called decontamination process would be safely buried at Hanford, Washington, or Beatty, Nevada. Since both states in the recent past have refused to accept radioactive wastes from Commonwealth Edison because of its poor safety record in shipping, how can NRC be so sure they will accept these wastes? And if not, what then?

On page 2 of Appendix A, a statement is made that no migration of radionuclides had been observed at either Beatty or Hanford. Has not migration of plutonium been reported from the Hanford site, causing concern about pollution of the Columbia River?

The details of the extremely hazardous waste disposal methods which were permitted at Oak Ridge do not impart a feeling of confidence in the regulating agencies. As a former resident of Oak Ridge, I am appalled at what was allowed to occur in that beautiful part of our country by such sloppy disposal of radioactive materials. Much may be learned afterwards by such disasters about precautions which should have been taken. It is time we stopped proceeding to inject this dangerous material into the environment until we have proven evidence that it can be safely contained over the long periods that it remains a threat.

Your assumption on page 4-5 that the additional radiation exposure to workers involved in the decontamination process is negligible is based on a 1974 study. Should you not at least acknowledge several later studies (such as that by Mancuso) that any additional amount of radiation is harmful to human health?

Highly questionable is the EIS assumption that closing Dresden I would necessitate a \$300 million expense for purchase of replacement fuel over a 15-year-period. Such a conclusion ignores the excess generating capacity of ComEd which renders replacement of Dresden I output unnecessary.

Further attention should be given to the advisability of shutting down Dresden I.

Sincerely,

Cecile Meyer

COO 2/10

10001

8008050037