

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Ivan W. Smith, Chairman
Dr. Frederick P. Cowan
Gustave A. Linenberger



In the Matter of)
)
CONSUMERS POWER COMPANY) Docket Nos. 50-329 OM
) 50-330 OM
(Midland Plant, Units 1 and 2)

In the event of an accident at the Midland Nuclear Plant which is being built on the Tittabawassee River, in the city of Midland, Michigan, massive quantities of radioactive materials especially in the event of a Class 9 accident, will find their way into the river which flows into Saginaw Bay, the drinking water supply of the Midland-Saginaw area population.

Models to assess the consequences of the possible massive contamination by the radioactive releases on the health, water supplies and economic costs for new water supplies or water sources have not been sufficiently or adequately addressed in the Midland situation. Even Wash-1400 indicates the contamination of water supplies has not been considered in detail. Assumptions that rivers and lakes will be contaminated for only short periods of time, in a Class 9 accident, is a major flaw of the Wash-1400 presentation.

The NRC's NEPA environmental reviews have not included any evaluations of the consequences of Class 9 accidents at the Midland Nuclear Plant, however, as a result of the Class 9 accident at 3 Mile Island and the Risk Assessment Review Groups conclusion that estimates of the absolute probabilities of Wash-1400 are not reliable, the NRC has no theoretical or practical basis to justify excluding the safety of environmental assessment of Class 9 action for the Midland Nuclear Plant. Since the NRC has itself concluded that the TMI accident was a Class 9 accident.

We therefore urge you to order a review of the Midland EIS to include complete public rulemaking for the inclusion of Class 9 accidents at the Midland reactor plant. Concerning Midland, sister plant of TMI, which is now under construction, in a letter dated March 20, 1980, the Honorable Gus Speth, Chairman of the President's Council on Environmental Quality, writing from the executive office of the President in a letter to the Honorable John Aherne, Chairman of the Nuclear Regulatory Commission, said in part "the results of our review of impact statements prepared by the NRC for nuclear power reactors are very disturbing. The discussions in these statements of potential accident and their environmental impact are found to be largely perfunctory, remarkably standardized, and uninformative to the public. Despite the broad diversity of size, design, and location of the nuclear reactors licensed by the commission over the years, virtually every EIS contains essentially identical, boiler plate language written in an unvarying format. The typical EIS does

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not consider or analyze the possibility of a major accident even though it is these Class 9 accidents which have the potential for greatest environmental harm and which have led to the greatest public concern. Moreover, for those accidents which are typically discussed in EIS the potential impact of human health and environment are presented in a cursory and inadequate manner, with little attention to the public understanding."

In addition to the above, the Mapleton Interveners urges the Atomic Safety Licensing Board to fulfill the requirements of NEPA in full disclosure of the Midland Plant's Nuclear hazards.

Futhermore, we desire a review of the untenable location of the plant within the large population center and next to the large Dow Chemical Complex.

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