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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing and Service Branch

Dear Mr. Secretary,

I attended the February 23, 1993 meeting in Lansing, Michigan on the Palisades Dry Cask Storage System. I was hoping to voice my support of the system but Attorney General Kelly and his anti-nuclear activists seemed to have their own agenda. It was suddenly more important to end the meeting, and my card mysteriously disappeared from the stack of those of us who had signed up to speak. So much for the democratic process that several speakers had complained was being subverted by the NRC.

It soon became obvious that this was not so much concern about the storage of fuel in casks. Instead, the anti-nuclear activists see the Palisades fuel storage problem as an opportunity to close the Plant. What was supposed to be an opportunity for citizens to express concerns about dry cask storage at Palisades quickly degenerated into a bashing of nuclear power. What I witnessed was a format guaranteed to play on the public's fear.

Are there valid concerns about nuclear power? There certainly are, but it is not fair to the people of Michigan to link CFCO's attempts to continue the safe storage of its nuclear fuel with the activist's insistence that we shutdown Palisades and every nuclear plant in the country.

I was especially concerned about the claim that the VSC design is "substandard." If by substandard, we mean that this is the least expensive, least complicated design that employs the least exotic of materials and manufacturing methods such that it can be built on site without expensive front-end transportation costs then, I agree, these are truly "substandard" casks.

If by substandard, we mean that the VSC is somehow designed to less rigorous standards, not able to perform its intended service, not able to fulfill its design criteria, somehow just not as good as other dry cask storage systems, then I totally disagree with the claim.

The beauty of the VSC is plainly its simplicity, its low material costs, and its ability to be constructed on site. I might add that it would be to other vendors' advantage to suggest a "less than the best" mentality to the anti-nuclear crowd.

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I am also concerned by the claim that because the VSC is not transportable, it is more apt to become a permanent storage facility. At the time Palisades was bidding the job, it was obvious that no one could predict with any certainty what would ultimately be acceptable for final shipment of fuel. To purchase dual-use casks, hoping that the final requirements would match what was purchased in the early nineties, would not necessarily be the wisest use of one's funds. There is also no reason to believe that the VSCs will not someday be moved back to the spent fuel pool for transfer to transport casks. The beauty of this scenario is that very few transport casks would be required over the several months envisioned for gradually moving the fuel to its final disposal site. Furthermore, I believe it is the DOE's responsibility to "come and get it" at their expense, not the utility's.

Another concern that I have is that those actively opposing dry cask storage seem to believe that the fuel is not in any way a present danger, that only by storing it in dry casks does it become so. Though I believe the fuel is safely being stored in the Palisades fuel pool, I would personally feel better if it were stored in the VSCs. The fuel is currently stored in a pool which is closer to Lake Michigan, both in terms of distance and elevation. The fuel pool requires continuous operation of pumps, valves, heat exchangers, etc. The fuel depends on the water for shielding, cooling, and reactivity control. The pool is covered by little more than a sheet metal building. There is nothing unusual about this. Most Nuclear power plants employ the same design.

The VSC on the other hand is passive, requiring no water, no pumps, valves, or heat exchangers. Its concrete containment is designed to withstand tremendous impacts and temperature variations. Though analyses have shown the current loading in the spent fuel pool to be acceptable, this pool was probably not intended for long term storage of the current amounts of fuel being stored there.

Finally, if the anti-nuclear groups are successful in shutting down Palisades, where do they think twenty years of fuel is going to go? They certainly won't want it shipped on our highways or railways. And who is going to take it before the Federal Government solves the waste problem? Palisades, and every other nuclear plant, is in fact a de facto waste storage facility, whether the fuel is stored in the fuel pool or dry casks.

I am reminded that the infamous Palisades cooling towers were installed at the insistence of environmentalists who were certain that warm water from the Plant would be hazardous to the Lake. Years later, and millions of wasted dollars later, I understand that a study showed that piping Palisades cooling water to the Lake would have done no environmental harm. In

fact, the Campbell 3 Coal Plant, forty miles north of Palisades, does just that. Unfortunately for the citizens of Michigan, the Palisades Plant operates far less efficiently than it would have, because of this expensive mistake.

I trust that we will not be dragged into another fiasco where the real losers are the majority of us who end up paying higher taxes and utility bills while others push their favorite agendas.

Sincerely,

Dewey Van Den Berg

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