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September 28, 1982

U. S. Nuclear Regulatory Commission
Attention: Paul H. Leech, Director
Clinch River Breeder Reactor Program
Washington, D.C. 20555

Dear Mr. Leech:

In regard to the 1982 Draft Supplement to the 1977 final Environmental Impact Statement for the Clinch River Project, Wisconsin's Environmental Decade strongly believes it to be unacceptable. The main criticisms stem from the type of nuclear power plant to be used and the huge costs of decommissioning added by the use of this type of plant.

The idea behind the breeder reactor is to make more fuel than is added. We believe that it does not add significantly more fuel in terms of money saved, especially when the associated maintenance costs needed to keep the plant in operation are considered.

Most of the maintenance costs develop from the use of liquid sodium as a coolant. The corrosion problems brought on by the use of sodium will prove to be too costly for ratepayers. Also the use of sodium involves an added loop to separate the radioactive sodium which means more initial expense and a greater chance of corrosion (more tubing). The tubing will have to be replaced or sleeved which means temporary but periodical shutdowns. The Decade questions the fairness to the ratepayers by the use of the troublesome breeder reactor.

The second criticism involves the costs of decommissioning of the breeder. The Decade contends that any amount retained for shutdown costs is impossible to do. Any estimate will charge too much or not enough for decommissioning. Again, fairness to the ratepayer is in question.

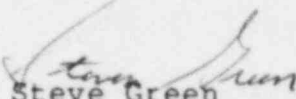
Also, plants that have been shut down before their expected lifetime have had greater decommissioning costs than the initial costs of the plant. When the arbitrary decommissioning costs are considered, the rate becomes unreasonable.

The Decade recommends that alternatives to the breeder should be given much greater consideration. Instead of burdening the ratepayer with this project, the TVA should investigate alternative energy sources and conservation measures. Solar power in the residential home should be considered. With solar power, the wall of unexpected costs will not come crashing down on the ratepayer.

Conservation will give the time needed until a sound technology can be implemented. But whatever technology is pulled out of the bag, a variety of technologies in use will brighten the risk taken.

The Draft Supplement to the 1977 Environmental Impact Statement has failed to emphasize the impact of decommissioning costs in its analysis. The breeder reactor brings risks to investment and unfairness to the ratepayer. The Decade believes that the use of the alternative energy sources--solar power and conservation--will be a much cheaper and easier implemented road to take.

Sincerely,


Steve Green
Project Assistant

SG:JR