

STATEMENT TO NRC CONCERNING SUSQUEHANNA PLANT

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FROM: STEPHEN W. BAIER, 1412 FAIRVIEW STREET, ALLENTOWN, PA.

Thank you for the opportunity to express my opposition to the opening of the Susquehanna Nuclear Plant.

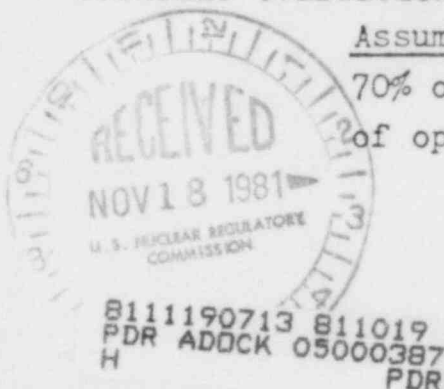
My opposition to nuclear power is grounded in one concern: my concern for life; a life for myself, friends, relatives, and all Americans, without a fear of radioactive contamination of our environment and our bodies. As a biologist I understand the interconnectiveness of life and the earth's ecosystems, and I am aware of the long and short term effects of radioactive contamination on all living organisms.

If PP&L were to make a decision today to begin construction of a nuclear generating plant, I strongly feel they would decide to remain a non-nuclear industry. Nuclear power has proved to be a liability for the majority of nuclear utilities. The economic realities and the effect on future rates are grounds for denying PP&L an operating license for Susquehanna.

Several pages in the most recent PP&L profile provide an overview of the economic impact of Susquehanna Nuclear Generation. One statement stands out: "changes in these assumptions could alter the results presented in the charts and text."

Operation of Susquehanna will cause an immediate rate increase of 30-40%. PP&L claims a net revenue savings is expected about 10 years after the two reactors begin service. However, looking again at the assumptions, their claim is at the minimum optimistic; Based on present knowledge it seems quite unrealistic and misleading. I will only mention a few problems associated with PP&L's economic evaluation:

Assumption 1: The plant is expected to run reliably at 70% of its capacity. No large reactor has a record of operation near 70%.



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Assumption 2: A large financial advantage of the plant would result from selling all or a part of the power generated by Susquehanna to the PJM grid. It is questionable that PP&L's expected sales will become a reality based on a decreasing demand for electricity in the grid. It is interesting to note that PP&L's latest rate request mentioned less than expected sales to the grid as partial justification for the requested rate increase.

Assumption 3: PP&L will not face shutdowns of the reactors due to accidents, public pressures, or regulations as additional flaws in reactor design are uncovered. TMI exemplifies the extreme costs of a major accident. Another major accident is statistically likely to occur during the life-span of the Susquehanna reactors. The public would likely demand closer scrutiny if not total shutdown of nuclear reactors.

Assumption 4: Radioactive waste storage will be established and largely funded by the federal government. At this time, all wastes are being stored at the reactor sites. Several utility companies are being forced to construct additional storage facilities. Technical problems of storing high level wastes prevent disposal at this time. Even if an acceptable disposal technology is developed, the political situation may prevent unfair taxpayers subsidies to provide storage for the nuclear utilities.

Additional costs, not calculated in the costs of Susquehanna, include insurance premiums and the cost of a major accident. No less important are the less quantitative costs associated with

nuclear power production. These include, but are by no means limited to, health effects on uranium miners, workers in processing plants, and citizens living near the plant or along fuel and waste transport routes; the negative impacts on the Susquehanna River ecosystem; higher rates of electricity, thus discouraging industry from locating in the area; a loss of property values to local landowners; government subsidies to the nuclear industry; and a lack of motivation by PP&L to promote alternative energy sources (note that if electrical <sup>consumption</sup> decreases financial benefits of Susquehanna also decrease).

A realistic and detailed economic study of the financial impact of halting construction of Susquehanna has not been completed by PP&L. The decision to continue construction and the request for an operating license is a result of momentum, not a continual careful evaluation of the economics. PP&L should be denied an operating license, and must be forced to evaluate all costs and benefits of operating Susquehanna.

I support an independent economic study of the costs of continuing versus halting further construction of the Susquehanna plant (plant. This option has been carefully studied and requested by the Susquehanna alliance.

In conclusion, nuclear power represents a technology out of tune with a rationalistic approach to the earth's resources and to human life itself. PP&L unfortunately made a nearsighted decision to construct Susquehanna, and must be prevented from imposing undue financial hardships on their ratepayers as well as health risks to everyone affected by radioactive contamination because of their corporate errors. The economic realities and health hazards of operating Susquehanna are more than adequate justification for the denial of an operating license.