1007 Alabama
Lawrence, KS 66044
March 10, 1982



Director, Division of Licensing
Nuclear Regulatory Commission
Washington D.C. 20555

Dear Director, Division of Licensing,

I am writing in response to the Nuclear Regulatory Commission's invitation to interested persons to comment on the Draft Environmental Statement related to the operation of Wolf Creek Generating Station, Unit No.1. After a very limited reading of the Statement I make the following observations and questions:

1) Is there any way to protect the water shed which supplies the drinking water for the City of Lawrence, Kansas from the consequences of a radiological emergency? With winds coming our way 38% of the time, will emissions from normal operating of the plant reach the Wakarusa Valley which is 35 miles north of WCGS?

2) In order to keep the radioactivity at a minimum in the water leaving the plant, thru trying to prevent denting and corrosion in the steam generating tubes by the quality of the water which enters them, is there provision for continious and frequent reporting on the purity of the water to the NRC?

3) On page 5-44 the safety evaluation of the site includes a review of potential external hazards. Have the activities at the Richards-Gebaur Air Base south of Kansas City, Missouri been included in this review?

4) Will not the costs per kilowatt hour be greater than forecast if the life of the plant is actually shorter than the predicted 30 years? Based on the experience of other nuclear generating stations it seems imprudent to expect that any where near full capacity production will continue for 30 years. This would make the cost/benefit ratio quite different than presented in the DES.

5) Are the Emergency Preparedness plans that are already written and the State one which is in process workable? Will there be opportunity for public hearings on these emergency preparedness plans before they are accepted by the NRC? Will the plans be approved before the reactor is loaded?

In the case of the Coffey County plan, how can the sheriff's force of 7 officers and 6 reserves who are volunteers possibly make the initial warning within 15 minutes while still maintaining their workload within the County? How can 14 volunteer viremen be adequately trained to do the necessary monitoring of radioactive substances with safety



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to themselves and still keep performing their necessary duties? It does seem like the costs of these added functions should at least be borne by the utility company, rather than by the County which had no choice in the matter. The equipment necessary to meet the NRC's expectation of a prompt (45 minute) alert within the 10 mile EPZ seems to be lacking when you know of the existing fixed sirens and the use of mobile sirens. This is an example of the gap between what is written in an emergency preparedness plan and what the actualities are. That gap will effect the environment.

6) In Appendix F, pg F-3 there is mention of evacuating people moving under the cloud and moving in the same direction as the cloud is moving. Would it not make more sense to have the people move away from the path of the cloud in a perpendicular direction so as to escape fallout?

7) As for costs, why are not the costs incurred by rate payers included in the calculations of cost/benefit in the production of electricity?

8) I do not agree that the short-term destruction of"5) the atmosphere and water bodies used for disposal of heat and certain waste effluents to the extent that other beneficial uses are curtailed, and 6) land areas rendered unfit for other uses" (FES-CP pg 10-8) is going to necessarily create long-term productivity. If one-quarter of our population already is at one time in their lives going to have cancer, increasing that proportion is not going to enchance long-term productivity and well-being.

9) The production of 12,000 cu ft of low-level waste every year at WCGS creates a problem for us for which there is no solution currently. This is a problem that people have been trying to solve for over 37 years. Granted this is a new technology, it still is not right to continue making more low-level radioactive wastes that rapidly when there is no way to safely contain it. The amount of low-level waste created at WCGS annually will be 30 times more than the whole rest of the State produces. Even low-level radiation is detrimental to people's health. I think that Wolf Creek Generating Station should not go on line before there is a way to safely deal with the waste problem. This means both the low-level radioactive wastes and the fuel rods after they have fissioned. For neither is there a good way of managing the radioactivity over the many years that is necessary. (People 240,000 years from now may not be able to read the signs that indicate the danger of radioactivity even if we could find containers to hold it for a shorter period of time).

10) The cost of decommissioning is given in Table 6.1 as $63 million in 1984 dollars. I understand that there is no way to really estimate how much decommissioning will cost, and a rough figure used might be 10% of construction costs. If that is the case, then it would be estimated at closer to $200,000,000. Would the NRC staff assess this as a small cost? For only one paragraph to be written on decommissioning seems not to correspond with the concept of the limited number of years that the generating station will be of use in supplying an alternative source of electricity.

11) "Radiation doses to the public as a result of decommissioning activities should be very small and would primarily come from the transportation of decommissioning waste to waste-burial grounds."pg 5-68. Besides that time of exposure of the public thru transportation of radioactive wast, there is also that of the annual transport of low-level wastes and spent fuel rods from the site. Since the health effects of radioactivity are cumulative, exposing the public thru the shipment and accidents while being shipped, is not to be taken lightly since it is a real cost to the individuals affected, and therefore should be included in your cost/benefit summary.

12) I'm glad that it is recognized that conservation is making a difference in the rate of increase in the use of electricity. It raises again whether there is a need for such a large nuclear plant.

13) The remaining 20% of construction costs does not seem to be included in the overall cost/benefit summary and might influence the decision as to whether or not to consider operating the plant.

As stated in the beginning of this letter, I have not read the DES completely, but I do raise many questions about the conclusion which the staff reaches in 6.4.3, page 6-4.

Sincerely,

Anne Moore

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