

TO THE
UNITED STATE NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
ATTENTION: DIRECTOR, DIVISION OF LICENSING



FROM
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While I am a member of the Wichita League of Women Voters, a member of the Consumers Information Board of the Kansas Corporation Commission, and the Wichita-Sedgwick County Energy Monitoring Board, these comments are my own and do not represent the thinking, necessarily, of the above mentioned group and boards to which I belong.

RE:

DOCKET NO. STN 50-482
DRAFT ENVIRONMENTAL STATEMENT FOR WOLF CREEK GENERATING STATION,
UNIT NO. 1

March 13, 1982

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Those who read the first environmental statement relative to the construction license for Wolf Creek Generating Station and followed the Atomic Safety and Licensing hearings in Kansas City from January to May 1976 must experience a strong sense of deja vu upon reading the second environmental statement relative to an operating license.

Despite the cancelling of seven nuclear power plants in 1981, of eight in the first three months of this year, and sixteen more to be cancelled according to NRC staff estimates, despite the accident at Three Mile Island, despite the egregious errors at Diablo Canyon, despite the accident at Ginney, despite the embarrassingly inaccurate 1976 projections of demand, despite the fact that construction of nuclear plants is endangering the financial solvency of utilities, despite the Lewis, the Kemeny and the Rogovin reports, despite the problems of embrittlement and corrosion that are widespread, --yes, despite all these, the staff of the Nuclear Regulatory Commission can unequivocally make a case that the operating license for Wolf Creek should be granted because the nuclear power generated there would be safe, reliable, necessary and economic. Such optimism is suspect; and one is reminded of Harold Denton's use of the word "mind-set" to describe the attitudes of the regulators of the nuclear power industry.

ENVIRONMENTAL

Knowing that huge amounts of high level wastes, transuranic wastes and mill tailings generated by the nuclear fuel cycle remain in the environment, unburied after forty years, awaiting an acceptable long range management policy--even a demonstration facility, it is difficult to reconcile this environmental statement with the NEPA charge which requires the federal government to "fulfill the responsibilities of each generation as trustee of the environment for succeeding generations" and to "attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences."

Alternative power sources, such as conservation, cogeneration and other small power pose virtually no safety problems compared with the environmental hazards of nuclear generation and waste disposal.

DEMAND

It is stated on page 2-5 that the operation of WCGS will provide much needed capacity for maintenance of minimum reserve margins; yet, on average, the nation's

utilities have a 35 percent surplus of electric generating capacity, twice the recommended reserve margin. Moreover, many energy analysts predict that demand for electricity will remain flat and may even show negative growth by the year 2000. Because of energy efficiency the US economy is already using about 13 percent less energy to produce each dollar of product than in 1973; and by the end of the century, these analysts maintain, we will be using 40 percent less energy for our necessary end uses.

This RCC draft statement ignores the probability that the six major steam consuming industries will be heavily into cogeneration in the coming two decades. Vulcan, which now uses almost ten percent of KG&E's generating capacity, has already announced its plan to install cogeneration systems. Moreover, growing on-site use of wind machines and photovoltaic systems (probably imported from Japan) will be producing a significant amount of electricity by 1990. The staff also fails to recognize the effects of conservation, which is an energy source in itself. Demand has proven highly elastic; and ingenious customers will meet the challenge of higher and higher electric prices with weatherization, passive solar homes and buildings, more efficient appliances, landscaping, etc.

The NRC should have learned from the first environmental statement that demand forecasting is a highly risky art. This second statement with its unrealistic demand projection has been based on outmoded assumptions. Nuclear power with its long lead times and its high capital requirements does not provide the flexibility that is required in today's volatile energy market. Conservation, cogeneration, biomass, wind power and photovoltaics do meet these requirements of flexibility. The financial markets have already recognized this reality and are saying "no" to nuclear power plant investment.

ECONOMICS BENEFITS

On page 2-2 appears this extraordinary statement under the heading of Production Costs: "Because most of the substantial capital and environmental costs associated with construction have already been incurred, the only economic factors that are relevant for consideration now are system fuel costs and operation and maintenance costs, because these expenses will be affected by whether or not WCGS operates." Should WCGS go on line, KG&E's customers would wish they might as easily escape the costs per kwh of the huge capital investments. What new system of accounting allows the disregard of \$2 to \$3 billion? Nor is it easy to

imagine that bond and stock holders would agree to this facile elimination of their investments. Since the NRC staff conclusion that the three utilities participating in WCGS would receive a \$110 million a year benefit rests upon this new unorthodox form of bookkeeping, the conclusion lacks credibility.

On Page 2-2 it is stated that the normal capacity factor for WCGS would be 65%. Yet Charles Komanoff, an independent energy consultant, says that the new larger nuclear plants over 800MW are averaging only 55% capacity. Since the NRC estimate of the \$110 million cost saving also rests upon operating at 65% normal capacity, are the conclusions reliable? It is noted that the staff would expect only an \$86 million cost benefit the first year, and that the staff estimates an average 60% lifetime capacity factor--still 5% above Komanoff's calculations.

DECOMMISSIONING

NRC staff finds KG&E's estimated cost of decommissioning, \$63 million, as reasonable, Page 2-4. However, in R. S. Woods's "Assuring the Availability of Fund for Decommissioning Nuclear Facilities", 1979, page 4, from the NRC, it is estimated the cost of decommissioning a large commercial reactor (1000MW) would range from 4 percent to ten percent of construction costs. Since WCGS may easily cost \$2.5 to \$3 billion before construction is completed, 4 to 10 percent of this cost could be \$100 million to \$250 million. References for Section 2 regarding costs of generation and decommissioning, "Coal and Nuclear: A Comparison of the Cost of Generating Baseload Electricity," and "Technology, Safety and Costs of Decommissioning," page 2-7, are both studies published in 1978 and so are completely out of date and not pertinent to today's costs. Because no large nuclear power plants have ever been decommissioned, NRC staff's acceptance of the unrealistically low KG&E estimate must necessarily be largely guesswork.

RISK

Repeatedly throughout the environmental statement such terms as "negligible effect," "quite small," "exceedingly small," "not expected to be significant" are used. While the NRC does admit to some uncertainties in estimates of consequences, in risk estimate probabilities, nevertheless, the staff consistently leans toward the least and not the worst case. The staff seems never to have heard the dictum "If something can go wrong, it will."

Although the NRC staff has admitted the necessity for rebaselining of the

Reactor Safety Study, nevertheless, it also states that the technique of grouping as was done in the RSS has not been completely eliminated, page 5-48. The Lewis report would seem to receive only lip service; and assessing risk on a probabilities basis, as the NRC has done in the WCGS statement, is far too imprecise to form a basis for its decision.

Especially alarming is the statement on page 5-64 that the requirements of new safety measures that grew out of the Three Mile Island 2 accident have not been completely applied to the licensing process for WCGS. "The action plan presents a sequence of actions, some already taken, that result in a gradually increasing improvement in safety as individual actions are completed. The Wolf Creek Unit 1 plant is receiving and will receive the benefit of these actions on the schedule indicated in NUREG-0660. The improvement in safety from these actions has not been quantified, however, and the radiological risk of accidents discussed in this chapter does not reflect these improvements."

Surely, at the time KG&E is applying for an operating license, all these safety measures should have been implemented.

NRC Chairman Nuncio Palladino has recently stated that when a nuclear plant is licensed, it should have enough insurance to cover the cost of an accident and the cleanup, and that this coverage should be reviewed every two to three years so that inflationary factors can be taken into account.

Will KG&E and KCP&L be required to carry such insurance, and were such insurance costs included in the \$110 million benefit analysis conclusion?

From reading Appendix F regarding evacuation models for WCGS, it appears that the now repudiated RSS consequence model has been the NRC staff's guide. Even the requirements of this model are yet to be put into a final form for WCGS. Especially and absurdly inadequate would seem the assumption that the cost of evacuation and relocation would be \$125 (1980 dollar) per person which included cost of food and temporary sheltering for a period of one week.

Both the Kemeny and Rogovin reports urged the NRC to make reforms in three major areas of regulation: the licensing of new plants, safe operation of existing plants and plans for dealing with accidents and other emergencies at nuclear power facilities.

CONCLUSION; This environmental statement would appear to have been written with little or no regard for the reforms advocated by the Kemeny and Rogovin reports. The NRC continues to be more concerned with giving out licenses than with improving the safety of nuclear power plants. The license should be denied.