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March 23, 1982

Mr. Ronald W. Hernan
Licensing Plant Manager
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C.



Dear Mr. Hernan,

I am writing to question the contents of Section 5.11, "Decommissioning", of the NRC's Preliminary Draft Report on the Environmental Impact of the Midland (Michigan) Plant. The statement, "The technology for decommissioning nuclear facilities is well in hand and, although technical improvements in decommissioning techniques are to be expected, at the present time decommissioning can be performed safely and at reasonable cost...", is a particularly bothersome comment. What principles of syllogistic reasoning and scientific analysis were used in determining the cost of decommissioning this facility as "reasonable"? Is the public, and especially the Consumers Power ratepayer, to assume that the cost of decommissioning equal to, and in all likelihood, in far excess of the original construction costs, is "reasonable"?

Is the reviewer of the Preliminary Draft Report expected to endorse the assumption that "...Decommissioning costs for reactors are a small fraction of the present-worth commissioning costs..." after being referred to NUREG-0586, "Draft Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities", which indicates that the Elk River, Minnesota plant cost \$.2 million more than the original construction cost of \$6 million?

Using the formula suggested in NUREG-0586, one can easily estimate an approximate cost of decommissioning the Midland nuclear facility as well beyond \$4 billion! Construction costs to date are \$3.39 billion and will undoubtedly exceed \$4 billion by the time the plant goes on line in 1983 or 1984. Did the NRC factor in the impact of inflation in their estimate? Was the fact that the Midland plant is much larger than the Elk River facility and therefore will require greater decommissioning costs, included in the analysis? If so, how is it possible the NRC could refer to these exorbitant costs as "reasonable"?

As an agency of the U.S. Federal Government, the NRC is responsible to the American people for any evidence of environmental impact that may cause physical or economic harm when considering the licensing of a nuclear power plant. It appears those who prepared the preliminary environmental impact draft for the Midland nuclear facility have failed to carry out this charge.

Sincerely,

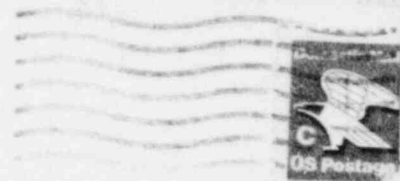
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