

RUSSELL M. BIMBER
10471 Prouty Road
PAINESVILLE, OHIO 44077



May 9, 1982

Att'n: Director, Div'n of Licensing
Nuclear Regulatory Commission
Washington, D. C. 20555

COMMENT ON NUREG 0884 (DES-OL, PERRY)

Benefit-cost evaluations are often superficial, speculative, and influenced by hope of personal and/or corporate gain. Page 2-1 shows CEI grossly over-estimated the need for power (and population growth) until it got the Construction Permit. Now it seems to be underestimating future population in the ten mile radius EPZ, presumably to minimize its costs for emergency planning and preparedness. This may increase the risk to people in the EPZ, so I suggest the 1980 Census results be added to the planning base, and no population projection less than a linear extrapolation from 1970 and 1980 populations be allowed.

Page 5-42 says the risk to PNPP from nearby explosions from other industries, etc is negligibly small. My letter on page A-17 of the FES-GP envisioned a massive explosion of propane from Lake Underground Storage in the nearby Morton Salt mine, which has never been evaluated. The Staff evaluated an above ground explosion, but said an underground explosion was not credible. In view of Texaco's drilling into a salt mine in Louisiana with disastrous consequences (Science 81, November, 1981), I must disagree with the NRC Staff, and explain why I think a propane explosion in the Morton Mine is a credible event.

The wells of L.U.S. are about 1 1/2 miles from Morton's mine shafts, on the surface, but the separation in the salt stratum they share 2000 feet below may be dangerously small. Up to 500 million gallons of liquid propane at about 150 psi in one or more solution-mined cavities could find its way into the atmospheric pressure air of the mine. The mine is replete with electrical equipment, machinery, and other potential sources of ignition. The mined height is typically eighteen feet, and crosshatched tunnels may provide an airspace equivalent to 30 square miles. It is to be expected that L.U.S. and Morton will deny any possibility of the catastrophe I have envisioned, but what, if any monitoring are they doing? As a minimum, I think Morton should be monitoring for propane in excess of what may come from their propane-fuelled earthmovers and natural gas in the mine. Some well-logging techniques might also be tried in the mine at the expected closest points to the propane storage.

The proposed site of Lake County's Emergency Operations Center for responding to emergencies arising from the Perry Nuclear Power Plant is underground, in a former Nike Site, above the propane storage. Could an explosion both cause trouble at FNPP and disable Lake County's E.O.C.?

C002
B/
1/0

On page 6-1, the Staff assumes PNPP will generate 11.6 billion KWH/YR, or 55% of its nameplate capacity. I think this is much too optimistic. The same group of utilities, "CAPCO", operates the Davis-Besse plant, which has about the poorest record of any nuclear power plant in the country. Has it ever reached even 27.5% of nameplate capacity IN ANY OF THE FOUR YEARS IT HAS BEEN STRUGGLING TO OPERATE?

It seems deceptively redundant to cite the peak generating capacity expected and several items depending on that as if they were separate benefits. The 11.6 billion KWH/YR is only 55% of 2410 MW. At 27.5% of 2410, or 666MW, the generating costs may be increased, not reduced, and the system reliability may not be improved.

Page 6-2 says only fuel costs and operation and maintenance costs must be considered to find the reduced generating costs. Plant construction, decommissioning, and perpetual management of radioactive fission and activation products were assumed negligible, even though the latter two are still not known. (Somewhere, CEI has estimated decommissioning Perry will be much cheaper than the \$500 million estimate I've heard for Indian Point I.) The TVA's experts were quoted in the Christian Science Monitor, May 5, 1982, page 3, saying coal power was cheaper than nuclear power!

Page 5-39 includes the impossible statement, "This [TMI] exposure could produce between none and one additional fatal cancer over the lifetime of the exposed population." Such a fractional fatality is impossible, but there is a minute possibility that the entire exposed population could die from the exposure.

Page 4-15, considering potable water intakes, appears ignorant of Lake County's ownership of the former Industrial Rayon intake, and plans for it. A mention of very little irrigation overlooks the significant addition to groundwater from lakewater furnished to unsewered areas by Painesville and by Ohio Water Service, for example. I have managed my own well from 1953 until a sewer project recently lowered the water table; I attribute a two foot rise in my water table to public water service to areas uphill from me. The Lake County Sanitary Engineer has been quoted in the local paper as saying most of the flow of the Kellogg creek, near my home, is due to similar sources.

Page 5-13 overlooks the fact that man is an endangered species, threatened by nuclear power, including even the routine, deliberate releases from nuclear power plants. The statement on page 5-38 that the release of millions of Curies is not significant is inconsistent with the known dangers of ionizing radiation and the NRC's regulation of even millicurie amounts of radioactive materials.

Page 5-14 shows the Staff knows better than to allow listing a potential tax benefit of \$22 million.* According to the Lake County Coastal Energy Impact Study, which cost the County Planning Commission \$60,000., the potential benefit should be only \$1 million per year.

The anticipated benefits of PNPP accrue heavily to CAPCO, whereas the costs fall in a less identifiable manner, even on generations yet unborn. Even if the opponents of PNPP were to be given funds to state their case, a fair benefit-cost evaluation seems improbable.

Sincerely,

Russell M. Bimber

Russell M. Bimber