

1104 East 15th Street
Ashtabula, Ohio 44004
May 23, 1982

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

RE: Draft Environmental Statement Perry Nuclear Power Plant Units 1 & 2
Docket Nos. 50-440 & 50-441 CEI

Gentlemen:

As a landowner and prospective farmer within the 10 mile radius of the Perry nuclear power plant, as a graduate of Ohio State University College of Agriculture, with course work directly relating to the operation of the Perry nuclear plant ie. soil chemistry, dairy science, forestry, ornithology, genetics, reproductive physiology, physics & monogastric nutrition; as a former Peace Corps. volunteer in Nepal - a culture in which human values are placed above economic (witness Alara) as a small businessman engaged in trying to improve & beautify the environment (and make a small profit) with landscaping, as a student for the past 4 years, educating myself in the construction and operation of nuclear power plants, and most importantly as a father of two - soon to be three, I feel it is my moral obligation, and responsibility to comment on the draft environmental statement.

I. General

If you permit CEI and the other members of Capco to operate Perry you will be:

1. condoning their waging of nuclear warfare on their own ratepayers. The atmospheric & liquid emissions differ only in amount, not kind, from those of a nuclear explosion.
2. Abrogating, denying & discouraging the destruction of the rights of "life, liberty, and the pursuit of happiness" as formulated in the Declaration of Independence.

Witness: Known effects of low level radiation with resulting cancer, infant mortality, death & genetic mutation.

: Implied deaths, immediate and delayed, resulting from "normal" operation of the plant (pg. 5-20-21) (DES)

: Unknown number of deaths from an almost certain catastrophic "accident" either at Perry or at another nuclear plant.

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3. The denial of the security of one's home and prevention of unlawful seizure as guaranteed by the constitution of the United States.

Witness: Huge chunks of American landscape rendered uninhabitable, perhaps forever as a result of an accident. Crops and food stuffs would be confiscated and destroyed. Water supplies made poisonous, homes, businesses, farms and orchards contaminated perhaps to the point where they would never again produce anything usable by any living thing - plant, animal or human. All but a small fraction uncompensated because of the Price/Anderson Act.

4. You personally will be responsible for the deaths and suffering which real human beings will suffer if this plant goes into operation - now and forever.

II. Specifics

1. Electrical demand has plummeted in the Capco area resulting in no need for Perry. As I understand it (from newspaper articles) the power generated at Perry is to be used elsewhere, making your entire Sec. 2 analysis false. Most of the economic costs have been sunk - by CEI - the public has not yet begun to pay.
2. Sec. 3 you are correct in stating; "it is not rational to consider different sites, dramatic plant modifications, or the construction of new & different energy sources or alternatives...unless a compelling safety or environmental concern which was not evident during the construction permit is discovered". Fortunately, compelling concerns have been "discovered".

TMI - 2

GINNA

BIER III

SECRET FALLOUT - Ernest Sternglass

NUCLEAR WITNESS

CANCER MORTALITY CHANGES AROUND NUCLEAR FACILITIES

IN CONNECTICUT - Sternglass

VOICES FROM THREE MILE ISLAND - Robert Leppzer

etc. etc. etc.

It is only rational to consider the new (?) evidence and blatantly immoral & criminal to ignore it.

3. The estimated releases from Perry (air & water) are too low, probably by a factor of 10. When Dr. Sternglass was informed of the material you republish in the ~~USA~~ concerning radioactive releases, he laughingly said they will be on the order of 300,000 - 900,000 @/year. Therefore your estimates of deaths, cancer & mutations are conveniently underestimated.

4. Nuclear plants produce about 169 Radionuclides. You have not considered about 2/3 of the fission products in your dose estimates (list pg. 5-36-37 tables D-4 & D-7) in which I count only 60.

Your lists are simply Perry FSAR (pg. 35-37) material reprinted, compiled originally by CEI. I thought that you are the regulators - do the operators of nuclear plants now set standards for themselves?

5. Your methodology for estimating internal dose commitments due to consumption of locally grown produce and meat are horrendous. Many people in this area either grow most of their own fresh vegetables, eggs, honey, milk, meat & fruit or buy a majority of it locally. Every element from hydrogen to calcium to carbon, used by living beings will be released as a radioactive poison from Perry. (See Perry FSAR & METHODOLOGIES FOR THE STUDY OF LOW-LEVEL RADIATION IN THE MIDWEST - Dr. Charles Hulver & Land/Leaf Research Team.
6. If I understand appendix E correctly, "Rebaselining of RSS Results for BWR's", you have increased the probability and severity of accidents for BWR's as a result of TMI-2. The accident sequences listed all result in over pressurizing and breaching of containment accompanied by core melt - lovely. These sequences are especially significant for Perry because the containment is a prototype and remains substantially untested.

For the above reasons I believe the DES is largely a very poorly reasoned and documented apology for an already accomplished decision. The facts are altered, and any contrary evidence is either buried or ignored.

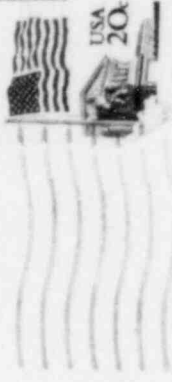
Respectfully Submitted,



Stephen Sass

in behalf of: Sally, Sarah Marie,
Nicholas and the unborn Sasses

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