

The INDIANA SASSAFRAS AUDUBON SOCIETY

of Lawrence - Greene - Monroe -
Brown - Morgan & Owen Counties

August 17, 1982

54-537



TO: OFFICE OF NUCLEAR REACTOR REGULATION,
U.S. NUCLEAR REGULATORY COMMISSION

RE: DRAFT SUPPLEMENT TO FINAL ENVIRONMENTAL
STATEMENT, CLINCH RIVER BREEDER REACTOR

The Sassafras Audubon Society has reviewed the Draft Supplement to the Final Environmental Statement related to construction and operation of the Clinch River Breeder Reactor Plant (CRBRP), Docket NO. 50-537 and finds it unacceptable on grounds literally too numerous to mention. This statement will be limited to the issues of NEED and COST.

First and foremost, need for the CRBRP is not established in Chapter 8, NEED FOR THE PROPOSED FACILITY. In fact, only conjectures of its "possible" need decades hence are given as the raison d'etre, reason enough for our request that the NRC staff recommend in the Final Supplement that the CRBRP Project be canceled.

The NRC staff notes on page 8-2 that "Because of the long lead-times involved, even with vigorous pursuit of this plan (construction and operation of the intermediate size CRBRP), a commercially viable LMFBR and significant LMFBR market penetration are decades away." The staff also notes that there have been changes in the emphasis of the program, the most important of which is that the decision on deployment and commercialization of the LMFBR will be made by the utility industry.

Therefore, there is not only a question of need, but whether a nuclear power utility industry will even be around to contemplate such a decision decades hence. Not a single nuclear power plant has been ordered since 1978, while numerous projects have been canceled and more are under consideration for cancellation. The nuclear power market has evaporated home and abroad. Where is the need for the CRBRP?

What are the reasons for the decline of the nuclear power industry? It is universally admitted that the staggering costs of nuclear construction are not alone to blame, but that the continuing nation-wide decline in electrical demand is also responsible. The nation has an over-capacity beyond what is needed for peak demands. Conservation of energy and more efficient use of energy has been responsible in part for the decline in electrical demand with the clear potential of energy conservation and increasing use of soft-energy strategies lowering demand notably in the immediate future.

TVA, an applicant in the Clinch River Breeder Reactor Project, has "shelved" many nuclear power plant projects and is promoting energy conservation-energy efficiency in its service area. Its participation in the CRBRP Project is obviously politically directed.

0002 With all this in mind, the NRC staff's statements to the effect that the consequences of the early development of the CRBRP, even at the risk of developing the option before it is economically competitive with LWR's, are minor compared to the risk

of possible electricity shortages and economic penalties associated with late development is irresponsible. On what evidence is the forecast of "possible electricity shortages" based?

The economic penalties will come with the construction of the CRBR and be borne by the American people, who will bear over 90% of the costs at best, and conceivably all of it. The projected cost of the CRBRP of \$3.525 billion is hopelessly over-optimistic in view of what it costs to build an LWR and in view of the enormous cost overruns being experienced in the French Breeder Program and those of Japan and other European nations. The final cost of the CRBRP is more likely to surpass \$7 billion.

The futility of further argument is obvious. The Nuclear Regulatory Commission has given DOE permission to start construction before the plant has been licensed for "safety". The Nuclear Regulatory Commission and staff are willing to give the administration what it wants whatever the law and whatever the evidence.

Yours sincerely,

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for Energy Policy Committee, SAS