

West Runney Village  
Runney, NH 03266  
September 2, 1982

NRC  
Washington, DC 20555

Att: Director, Clinch River Breeder Reactor Program Office

RE: Draft Supplement to the Final Environmental Statement  
(NUREG-0139) for public comment by Sept. 13

My comment will focus on pp. 10-4 through 10-8, which addresses decommissioning of the CRERP. The ALARA policy as it applies to this nuclear project and the costs of decommissioning draw my attention. While I make my comments on ALARA, they will take on a personal nature because otherwise the people affected by the CRERP are successfully kept as statistics only.

1. ALARA stands for "as low as reasonably achievable" and on p. 10-7 it is worker exposure that will be handled ALARA. Yet it is health effects that will be ALARA. Terminal cancer and birth defects will be allowable at the CRERP -- among the workers -- if only they are kept to a certain number that someone has determined is "reasonable." As former Comm. Peter Bradford pointed out during his term with the NRC, it is time to debate what is "reasonable" to suffer in exchange for nuclear-power-generated electricity.
2. To make the issue personal -- it must not be allowed to be kept only in the statistical realm -- I am about to receive employment because a local twelve-year-old boy has contracted cancer of the bone. His hip bone is affected, so there can be no amputation "above the next joint." He has had chemo-therapy, lost his hair and much body weight. No longer will John Church be on the Plymouth High School's cross-country or downhill ski teams -- a super athlete. So his mother, a teacher, can be at home with him in the mornings, I will take her morning teaching load. His father has curtailed his employment so he can be with John in the afternoons. One of these days John will simply die. If he is part of the general population the NRC covers with its ALARA policy -- and who can prove that he isn't? -- then who is it who determined it is reasonable for John and his family to suffer now while he slowly and painfully dies?
3. I oppose the ALARA policy wherever it is used as a rationale for the CRERP's existence. I protest that not enough people realize how they are affected by ALARA.

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4. As for the costs of any of the decommissioning procedures, the costs associated with TMI Unit 2 are conspicuously absent from this set of pages. \$4 billion has been given as cost to clean up TMI Unit 2, and we are now 3½ years past the time the accident there began. I receive the Middletown, PA, PRESS & JOURNAL and know the process is tediously slow, with any number or combination of surprises possible as the damage to the reactor core is revealed by equipment that is invented as the operation proceeds. Bechtel Corporation has also seen fit to launch a FUSRAP program - - a money-maker needed because TMI shows there will be accidents to clean up and former reactor sites to decontaminate. With Bechtel seeing the "market" as good enough for launch of FUSRAP, I criticize these pages on CRERP's decommissioning as being naively optimistic that all decommissioning comes after a problem-free plant operation and the costs can be calculated early in the game. As a tax-payer I protest the use of tax dollars this way when social service programs for our country badly need funding.

Sincerely,

*Lynn Rudmin Chong*  
Lynn Rudmin Chong

copies:

Peter Bradford, Maine Public Advocate  
NH Rep. Barbara Bowler  
NH Executive Councilor Ray Burton  
NH Senator Gordon Humphrey

Washington Post

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