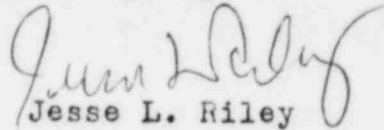


October 22, 1982  
854 Henley Place  
Charlotte, NC 28207

Dr. Kahtan N. Jabbour, Project Manager  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Dr. Jabbour:

Will you please see that the following comments are transmitted, as appropriate, in the agency.

  
Jesse L. Riley

cc: Robert Guild, Esq.  
Palmetto Alliance  
Henry A. Presler  
Hal B. Tucker  
Judge Kelly  
Judge Foster  
Judge Callahan  
Al Carr, Esq.

C002<sup>B</sup>

CAROLINA ENVIRONMENTAL STUDY GROUP

COMMENTS: DRAFT ENVIRONMENTAL STATEMENT--NUREG-0921

The summary of the benefits and costs for the operation of the Catawba nuclear station is given in Table 6.1, p. 6-4, of the Draft Environmental Statement, NUREG-0921. There are, in our opinion, deficiencies on which we comment as follows:

COST-BENEFIT (6-1 to 5)

Two benefits are described as "large", 1) the supply of 12 billion kWh/yr of electrical energy and 2) reduced generating costs of \$47-310 million/yr (1986).

There are neither "large" nor "moderate" off-setting costs. The DES fails to recognize that the disuse or forced retirement of generating plants of equivalent capacity is a cost and the magnitude, defined by the claimed benefit, is "large".

A second off-setting cost will be the requirement on the customers of the Applicant to pay earnings on the Applicant's equity in Catawba. The inclusion of Catawba in the rate base will result in a request for an increase in rate which, if the past is precedent, will be granted. The consequent cost will be "large", using the scale provided by the characterization of the generating cost benefit.

These large costs should be considered in the cost-benefit balancing and may well change that balance in the view of the Atomic Safety and Licensing Board which is required by law to take into proper account all possible approaches to a particular project which would alter environmental impact and cost-benefit balance. NEPA of 1969, § 102 (2) (C,D), 42 U.S.C.A. § 4332(2) (C, D).

Additionally there is a large error in the magnitude of the electrical energy which, with reasonable assurance, the plant can be expected to provide. At the CP stage the FES anticipated energy production of 14.214 billion kWh/yr, having assumed a capacity factor of 70% and operation at 100% of rated power. Table 10.1, p. 10-2. The DES, assuming a 60% capacity factor, estimates 12 billion kWh/yr. The DES fails to consider that McGuire-1, a sister plant, is presently limited to 50% of rated power by steam generator deficiencies. Catawba-1, which has steam generators of the same Westinghouse, D-series, pre-heater type, may more reasonably be expected to provide 3 billion kWh/yr. There is not yet a sufficient basis to say how long this situation will prevail, nor what energy output, if any, will be attributable to Catawba-2.

Given this circumstance it appears reasonable to suggest that the energy benefit of Catawba-1 will be "moderate".

The lowered output of the plant will cause a corresponding reduction in the benefit to reduced generating costs, quite possibly placing them in the "moderate" category.

### ALTERNATIVES (3-1)

The DES, under an amendment to 10 CFR 51, does not consider alternative energy sources. There are, however, reasonable, environmentally significant alternatives, not directly relating to alternative energy sources, which require consideration.

Catawba-2 is at about a 40% level of completion. Applicant initially projected that Catawba-1 would be on line in 1979 and Catawba-2 in 1980. Fuel loading for Catawba-1 is now scheduled for 1984 and commercial operation for 1985. No corresponding dates have recently been announced for Catawba-2. The diminished growth in electrical use supports the conclusion that it is presently not possible to soundly project a time for placing Catawba-2 on line. Indeed, if recent trends in growth rate persist and some contemporary views are correct (Chemical Week, Sept. 15, 1982, p. 53, "Similar views . . .") and the spate of plant cancellations are reliable testimony, Catawba-2 may never operate. There is clearly the alternative that the further construction, at this time, of Catawba-2 weighs unfavorably in the environmental balance, and that construction should stop until and unless at some future date there is reasonable indication that the balance has changed. This view is consistent with the requirement of the NEPA that

(v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented

be made the subject of a detailed statement by the responsible official. There is, further, the holding by the D.C. Circuit that "to the fullest extent possible" "appropriate" consideration be given to environmental amenities and values; that the agency decision maker has before him and takes into proper account all possible approaches to a particular project which would alter environmental impact and cost-benefit balance. Id.

Another alternative would be the withholding of an operating license for both Catawba units until and unless it were apparent that the operation of Catawba-1 would result in a favorable cost-benefit balance.

### ADVERSE RADIOLOGICAL HEALTH EFFECTS (6-5)

The cost-benefit summary considers the radiological costs of reactor operation (Sec. 5.9.3), the balance of the fuel cycle (Sec. 5.10) and accident risks (Sec. 5.9.4), "small". "Uncertain" would be a better characterization. Cancers and genetic effects are slow to manifest and debatable to relate to source; fuel cycle consequences will occur over a period of time which dwarfs the human scale--there is no way of knowing; and the accident costs can only be made to appear acceptable by associating them with extremely low calculated, as opposed to experiential, probabilities. It would seem that the only reasonable conclusion is that, based on present information, these costs are indeterminate.

J. J. Hilby