



County of Somervell

OFFICE OF COUNTY JUDGE
COUNTY COURTHOUSE, GLEN ROSE, TEXAS 76043
TELEPHONE: 817-897-2322

ENCLOSURE 1
to
ASLB Letter

GEORGE R. CRUMP
COUNTY JUDGE

LINDA WILSON
SECRETARY

December 5, 1983

Director, Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Nuclear Waste Disposal

Please refer to my letter to Mr. S. Burwell, Director Division of Licensing, dated July 6, 1981. The statements contained in this letter still prevail. We vehemently object to nuclear waste being held or stored in Somervell County either on a temporary or permanent basis.

Please register this objection in your official proceedings during the coming hearings on this subject.

George R. Crump
County Judge
Somervell County, Texas

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Final Environmental Statement
related to the operation of
Comanche Peak Steam Electric Station,
Units 1 and 2

Docket Nos. 50-445 and 50-446

Texas Utilities Generating Company

U.S. Nuclear Regulatory
Commission

Office of Nuclear Reactor Regulation

September 1981



Post Office Box 351
Phone: 817-897-1322



County Courthouse
Glen Rose, Texas 76043



July 6, 1981

Mr. Spotswood Burwell
Director, Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Re: Solid Waste, Radioactive
(11.5.8 Environmental
Statement June 1974)

With regard to the radioactive solid wastes materials, which will be generated at the Comanche Peak Steam Electric Station (CPSES), located in Somervell County, Texas, we wish to object to the statement as shown in the subject data. The statement will be found on page C-155 of the Draft Environmental Statement, May 1981 (NURREG-0775).

Prior to the issuance of the operating license for this plant, we feel that the question of "disposal" of nuclear waste must be finally and firmly settled. It is not in the best interest of the general population of the area or the plant employees to allow this part of our County to become a "Temporary Waste Disposal Site." Temporary some-times becomes permanent. The citizens of Somervell County object to even the possibility that the CPSES would be used as a burial site - permanent or temporary.

The question of nuclear waste disposal must be firmly decided by Texas law before any fuel loading, operations of generating or licensing begin at the plant.

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I request that this letter and the objection it conveys be placed in the record and be favorable considered during your upcoming hearings.

Sincerely,

George R. Crump
County Judge

GRC:lw

15-m penetration would be a conservative estimate. The staff bases this conclusion on results of computer simulations of core-concrete interactions reported in Section A-2.3.6 of the "Liquid Pathway Generic Study" (NUREG-0440), which reads as follows:

Total basemat melt-through for an LBP for various core-melt sequences occurred in no less than 43 hours for limestone concrete. In some instances, the limestone concrete never suffered total penetration; ...

and

For limestone gravel, cooling time for the mass is expected to be similar to that for siliceous materials. However, because of the much higher heat of decomposition of limestone as compared to silica, the mass does not travel as far into the soil.

Inasmuch as the foundation of the Comanche Peak plant is limestone, the staff concludes that it is likely that any penetration would be considerably less than 15 m below the basemat.

The staff agrees that there is the possibility of fracturing of the limestone caused by the heat released from the core. The reactor core would be isolated by a distance of about 210 m laterally from the nearest surface water and at least 35 m vertically from the regional aquifer. Furthermore, even if extensive fracturing all the way to the regional aquifer were to occur, groundwater could not migrate to the core, because the piezometric level in that aquifer is about 22 m below the lowest level to which the core is estimated to penetrate. For these reasons, the staff considers that its conclusions on the contamination through the liquid pathway are valid and conservative.

8.5.8.3 The Uranium Fuel Cycle (WAL 7/13/81 A-16)
(JRD-2 6/14/81 A-3)
(GC-2 7/6/81 A-12) ←

WAL:

The major difference between the staff's estimated number of health effects from radon-222 emissions and W.A. Lochstet's estimated values is the issue of the time period over which dose commitments and health effects from long-lived radioactive effluents should be evaluated. Lochstet has integrated dose commitments and health effects over what amounts to an infinite time interval, whereas the staff has integrated dose commitments from radon-222 releases over 100-year, 500-year, and 1000-year periods.

The staff has not estimated health effects from radon-222 emissions beyond 1000 years for the following reasons: Predictions over time periods greater than 100 years are subject to great uncertainties. These uncertainties result from, but are not limited to, political and social considerations, population size, health characteristics, and, for time periods on the order of thousands of years, geologic and climatologic effects. In contrast to Lochstet's conclusion, some authors* estimate that the long-term (thousands of years) impact

*B.L. Cohen, "Radon: Characteristics, Natural Occurrence, Technological Enhancement, and Health Effects," Vol. 4, Progress in Nuclear Energy, 1979.

from the uranium used in reactors will be less than the long-term impacts from an equivalent amount of uranium left undisturbed in the ground. Consequently, the staff has limited its period of consideration to 1000 years or less for decision-making and impact-calculational purposes.

JRD-2:

For the short term, it is expected that the health and safety of the public and the workers will be assured through the use of existing burial grounds (Beatty, NV; Barnwell, SC; Hanford, WA) and plant-management practices of minimizing waste generation, volume reduction, and temporary onsite storage for low-level wastes.

For the longer term, several actions are underway to speed the establishment of additional low-level radioactive-waste burial grounds. First, the NRC has published for comment a new rule, 10 CFR Part 61, "Disposal of Low-Level Radioactive Waste and Low-Activity Bulk Solid Waste." Second, after receiving recommendations from the Interagency Review Group, the State Planning Council, the National Governors Association, and the Conference of State Legislators, the U.S. Congress passed a national Low-Level Waste Policy Act in 1980. This legislation assigned the responsibility for low-level-waste disposal to the states and included language that allows states to form regional state compacts that could exclude wastes from outside the compact after 1986. Several states or organizations (Washington, Idaho, Illinois, Texas, Virginia, Massachusetts, Southern States Energy Board) are evaluating their disposal needs and are moving toward the establishment of a regional disposal site or an individual state disposal site.

GC-2:

There will be no burial of radioactive solid waste at the Comanche Peak Steam Electric Station.

8.5.9 Decommissioning

8.5.9.1 Introduction (EPA-8,9 6/30/81 A-8)

EPA-8:

The only Commission policy on reactor decommissioning, including funding methods for decommissioning, is as stated in the regulations under 10 CFR Part 50.33(f), Part 50.82, and Appendix F to Part 50. Guidance is also provided under Regulatory Guide 1.86. These NRC regulations do not require the applicant to submit specific decommissioning plans at the time the application for an operating license is made. At the end of the station's useful life-time, the applicant will be required to prepare a proposed decommissioning plan for review and approval by the NRC. The plan will be required to comply with NRC rules and regulations then in effect.

With regard to funding decommissioning, the Commission requires that "the applicant possesses or has reasonable assurance of obtaining the funds necessary to cover the estimated costs of operation for the period of the license or for 5 years, whichever is greater, plus the estimated costs of permanently shutting the facility down and maintaining it in a safe condition." [From