

March 4, 1985

318 Summit Ave. #3  
Brighton, Mass. 02135

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

RE: COMMENTS ON THE DRAFT ENVIRONMENTAL STATEMENT RELATED  
TO THE OPERATION OF THE BEAVER VALLEY POWER STATION,  
UNIT 2 (NUREG-1094) (Docket 50-412)

John F. Doherty, address above, comments as below  
on the DEIS of the Commission with regard to the Beaver  
Valley plant.

Comment 1

Page D-1 of the DES states, "For younger persons, changes in organ mass and metabolic parameters with age after the initial uptake of radioactivity are accounted for." This would seem to indicate an accounting for the age, but not the sex of the individual. While there are certainly changes with age in adolescence for both sexes, the DES should indicate if its assessment of dose takes into account exposure to radiation from the plant for females at puberty and women in the early stages of pregnancy when there is rapid proliferation of breast tissue cells with increased risk of one of the forms of breast cancer.

Comment 2

The DES fails to mention other serious cancer and infant mortality impacts on human beings from tailings piles which must be created to provide the fuel for the Beaver Valley - 2 plant. Thus, at pages 4 and 5 of Appendix C, in the section titled "Radon 222" the DES should mention both non-fatal cancers and deaths to infants due to radiation induced birth defects.

Thank you for this opportunity.

Respectfully,

*John F. Doherty, J.D.*  
John F. Doherty

c.c. Ms. Marilyn Ley, Project Manager

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