



COPIES NUMBER 72
PROCESSED FILE PR 72
(57 FR 27645)
SIERRA CLUB — John Muir Chapter

222 So. Hamilton St., Suite 1, Madison, WI 53703 (608) 256-0565

September 6, 1992

'92 SEP 11 A9 58

69

Mr. Samuel Chilk
Secretary of the Commission
Nuclear Regulatory Commission
Washington, DC 20355

Dear Mr. Chilk:

RE: The Nuclear Regulatory Commission's proposal to expedite the use of dry cask storage for high level nuclear waste at Wisconsin Electric Power Company's Point Beach nuclear power plant in Wisconsin and Consumer Power Company's Palisades plant in Michigan.

The John Muir (Wisconsin) Chapter of the Sierra Club wishes to register its deep concern over the haste with which this proposal is being handled.

We urge the following:

1. **The public comment period should be extended to allow more time for the preparation of relevant documents and for the concerned public to submit comments.** Moreover, we believe that more adequate notice of the proposal should be given the public, particularly to citizens in Wisconsin and Michigan who would be most directly affected by increased high level waste storage facilities at these sites.

2. For an issue as significant as this, which affects not only the areas adjacent to the proposed sites but establishes a precedent for future high level waste storage for the entire nation, we do not believe the NRC's decision to issue merely an Environmental Assessment (EA) is sufficient. **The NRC should prepare an Environmental Impact Statement (EIS).** The EIS should include among other things a survey of the anticipated safe "life" of dry cask storage, an analysis of the adequacy of tests performed on the casks, and the possible danger to ground and surface water, especially to Lake Michigan.

3. Wisconsin Electric Power Company has already requested a permit from the Wisconsin Public Service Commission (PSC) to establish facilities on-site for dry cask storage. Wisconsin's PSC, after considering the issue, has determined that an EIS is required. **We urge the NRC to wait until Wisconsin's EIS is completed before any decision on expediting dry cask storage is made.**

Sincerely yours,

Mary Ellen Johnson
Conservation Chair,
John Muir Chapter,
Sierra Club

cc: Gordon E. Gunderson
Gregg Moore, John Muir Chapter Chair

9209150140 920906
PDR PR
72 57FR28645 PDR

DS10

...To enjoy and preserve the wild places of earth...



Printed on recycled paper