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THE LEAGUE OF WOMEN VOTERS OF ROCKY RIVER

ROCKY RIVER, OHIO 44116

SERVED APR 15 1986

April 10, 1986

Docket No. 50-346 ML
DOCKETED
USNRC

The League of Women Voters of Rocky River requests the Nuclear Regulatory Commission to consider this statement in the informal hearing wherein Toledo Edison Co. and Cleveland Electric Illuminating Co. have received approval from the Commission to dispose of low-level radioactive waste at Davis-Besse Nuclear Power Station, Unit No. 1. This sludge is to be buried on land, at a minimum thickness of two feet, covered with four inches of clean soil, and sealed.

The League of Women Voters of the United States has developed criteria to help state and local Leagues evaluate both the process employed in site selection and the suitability of a proposed site for low-level nuclear waste disposal facilities.

- 1) The League believes there should have been ample and effective public participation before this new on-site disposal facility was contemplated. No public hearings were held.
- 2) The League believes there should have been an environmental impact statement prepared. The Commission staff has determined not to prepare an environmental impact statement for the proposed action.
- 3) The League believes there should have been an examination of alternative sites. The Commission has concluded that an off-site disposal location would result in increased costs to the consumer.
- 4) The League believes in participation and review at all governmental levels. The Commission staff has proceeded but has not consulted with the Governor or any agency of the State of Ohio.

The League believes that low-level nuclear waste facilities should be sited in areas that pose the least amount of risk to the public and to sensitive environmental areas, and away from such areas as:

- 1) Natural hazard areas subject to flooding.....
- 2) Drinking water supply sources.....
- 3) Fragile land areas such as shorelines of rivers, lakes, or wetlands,
- 4) Rare or valuable ecosystems..., significant wildlife habitat.

Davis-Besse is located adjacent to Navarre Marsh and East of Crane Creek, Magee Marsh, and Ottawa National Wildlife Refuge. Because these are wetlands on the shore of Lake Erie, this is a particularly inappropriate site for ground burial of low-level radioactive waste.

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