

Daniel J. Taranto  
890 Cloudswood Road  
Fieldbrook, CA. 95521

August 14. 1986

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

Dear Sir:

In regard to the Draft Environmental Statement for decommissioning Humboldt Bay Power Plant, Unit No. 3 I respectfully submit the following comments:

1. The D.E.S. document itself is, in my view, poorly prepared with insufficient specific data basis for arrived at conclusions. There is too much reliance on unidentified "staff" "generic estimates" which are not based upon current site specific study, testing or analysis.

I do not feel secure with the safety of my community being assured on the basis of "generic risk estimates".

2. Nowhere could I find in the D.E.S. a mention of the fact that virtually no funds have been set aside for the decommissioning of this facility. The nuclear industry, in general, appears to be avoiding the issue of establishing a realistic cost basis for full DECON of a commercial reactor.

Humboldt Bay Unit No. 3 is clearly the best candidate currently available for establishing the "real" (not estimated) DECON cost basis for projecting a more accurate "set aside" funding formula for other active reactors around the nation. Until such a formula is established they too are destined to come to the end of their "economic lives" with insufficient funds for DECON.

As you are certainly aware, over dependence on the Batelle studies of very small experimental reactors are not comperable to commercial units and therefor a potentially catastrophic basis for "generic estimates".

3. The arguements presented for "SAFSTOR" are inadequate:  
ie: Page 1-3 1.3.3. (1) "...there is no Federal repository for spent fuel."

This fuel can be transhipped to Diablo Canyon to clear the way for complete DECON now. In the interest of serving the greater need for establishing a valid "DECON" cost basis for commercial units so adequate "set aside" funds can be established prior to closure (unlike Humboldt Bay Unit No. 3).

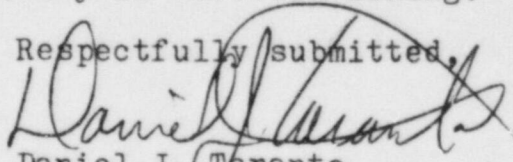
further: Page 1-3 1.3.3. (2) & (3) are redundant reasons therefor there is actually only one viable reason presented supporting SAFSTOR in the D.E.S. rather than the three suggested.

Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
August 14, 1986  
Page 2

4. In 30 years it is unlikely that anyone will be alive that had worked at the Humboldt Bay Plant when it was in operation. The D.E.S. does not discuss the fact that there will be no one familiar with those idiosyncratic elements inherent in all systems. The time to DECON is now while there are trained personnel on hand that are intimately familiar with the facility and its weak and strong aspects.
5. Currently there is no community contingency plan to deal with potential accidents which could leak radiation to the surrounding countryside putting human safety at risk. The D.E.S. lacks the worst case scenarios necessary to establish comprehensive preparedness. For example:
  - a. What would happen if there was an 8.0+ earthquake at high tide followed by a tidal wave?
  - b. What would happen if an airplane crashed into Unit No.3 exploded and started an uncontrollable fire?
  - c. What about this lack of a contingency plan?
6. There is no guarantee in the D.E.S. that SAFSTOR is "safe" nor that the utility will actually be any better prepared in 30 years than it is now to DECON. There is no time ceiling set for SAFSTOR, hence it is conceivable that the utility will simply extend for another 30 years, etc.

Further, in 30 years there will be many more reactors shut down most of which will be much larger than Humboldt Bay and hence proportionately greater potential problems that will dwarf Humboldt Bay Unit No.3 in relative significance. I can see this circumstance as creating a rationale to lower the priority to DECON our SAFSTOR unit in order to channel funds and personnel to cope with larger problems elsewhere. DECON now is clearly in the Humboldt community's best interest.
7. It is imperative that a local public hearing be held on this matter prior to is dispensation. If for no other reason, a local public hearing is critically important to maintain the appearance of objectivity in decision making.

Respectfully submitted,

  
Daniel J. Taranto  
Humboldt County Resident