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DESCRIPTION:
Ltr furnishing comments on Draft Enviro
Statement for Monticello Nuclear Plant....

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ACKNOWLEDGED

PLANT NAMES: Monticello Nuclear Plant

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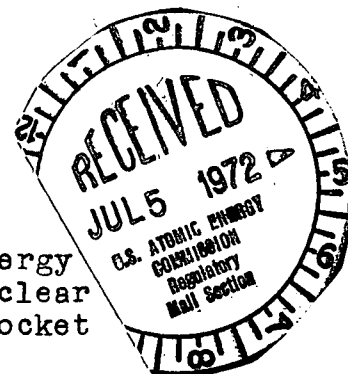
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MINNESOTA ENVIRONMENTAL CONTROL CITIZENS ASSOCIATION
CENTRAL MANOR • 26 East Exchange • Saint Paul, Minnesota 55101 • Phone: (612) 222-2998

June 30, 1972

Directorate of Licensing
U.S. Atomic Energy Commission
Washington, D.C.

Re: Draft Environmental Statement by the U.S. Atomic Energy Commission, Directorate of Licensing, Monticello Nuclear Generating Plant, Northern States Power Company, Docket No. 50-263



Gentlemen:

We have reviewed the Draft Environmental Statement for Monticello with concern, if not alarm, because of its inadequacy in defining impact of the Monticello Nuclear Plant.

Nowhere in this Statement is there reference to the potential effects on the public in terms of deaths or illnesses, or genetic affects which could result from day-to-day radioactive emissions throughout the life of the plant -- or can be postulated in the event of a severe accident at the plant.

Since risks to the public, now and in future generations, have been the cause for greatest concern among many informed, knowledgeable scientists and lay persons, it seems incredible to us that no consideration has been given to the degree of risks (in terms of public health effects) involved in the operation of this plant. We cannot see how any statement on environmental impact can ignore such critical considerations.

In addition to the unanswered questions regarding the environmental impact of radioactive emissions is the question of thermal pollution to the Mississippi River.

The Statement totally ignores the temperature criteria recommendations for this zone of the Mississippi River established by the Environmental Protection Agency on the basis of the St. Louis Conference.

Not only does the Statement ignore these temperature criteria recommendations -- it speculates on the basis of state temperature standards which do not exist because no mixing zone has ever been defined for the hot water discharges. To meet the maximum temperature limits as required by the State's permit in the form it presently exists, the Company may measure temperature as far away as New Orleans. The Statement accepts this lack of definition and further confuses the issue by saying (P. III-7), "Although it would not be necessary to operate the cooling towers in order to meet the permit temperature limits during much of the year, NSP has made a commitment to the MPCA to operate the cooling towers to the maximum extent practical."

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The Statement makes no attempt to define or question "the maximum extent practical" phrase despite its meaningless implications.

We find many optimistic conclusions throughout this Statement which appear to be based on assumption, often totally unfounded. For example:

P. VI-6: "In case of an accident, procedures which carriers are required. . . to follow will reduce the consequences of an accident in many cases. The procedures include segregation of damaged and leaking packages from people, and notification of the shipper and the Department of Transportation." There appears to be no answer to question of the driver being killed or injured in the accident.

P. VI-7: "Leakage of contaminated coolant resulting from improper closing of the cask is possible as a result of human error, even though the shipper is required to follow specific procedures which include tests and examination of the closed container prior to each shipment. Such an accident is unlikely during the 40-year life of the plant." Question: Is it realistic to assume no human error in 40 years?

P. VI-8: "It is unlikely that a shipment of solid radioactive waste will be involved in a severe accident during the 40-year life of the plant." Another unfounded assumption.

Many other such unfounded conclusions exist throughout this Statement. Many questions also exist which this Statement does not cover. For example:

What happens to the radioisotope tritium produced by the plant? What is its effect on the environment?

The Statement mentions the production of plutonium. How is this extremely toxic substance controlled? What happens if it is released to the environment? . . . through plant operations. . . or accident.

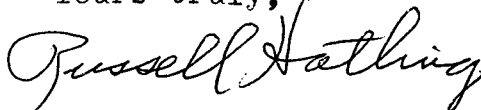
A statement on Page IX-1 reads, "After decommissioning of the reactor, the major portion of the site could be reclaimed for other purposes if desirable. If it is decided that the area occupied by the reactor facility should be placed on permanent restrictive access, that area would be irretrievably lost." Such lack of provision for removal of this reactor after it has been decommissioned would appear to be a violation of many of the ends of the National Environmental Policy Act outlined in the Statement's Forward (Pages xii-xiii).

We have been informed by the Minnesota Pollution Control Agency that the Atomic Energy Commission will hold public hearing on the Draft Environmental Statement for Monticello. It is our further understanding that the AEC staff personnel will be

.. available for testimony and cross examination.

The Minnesota Environmental Control Citizens Association intends to appear and participate as a party in that hearing. It is our intention that the above comments, as well as other considerations impossible to cover here, will be fully explored in the course of that hearing. We reserve the right to make additional comments on the environmental impact statement based on the record of that hearing.

Yours truly,

A handwritten signature in cursive script that reads "Russell Hatling".

Russell Hatling, Chairman
Power Generation Task Force

Regulatory

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