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DEPARTMENT OF NATURAL RESOURCES

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HOWARD A. TANNER, Director

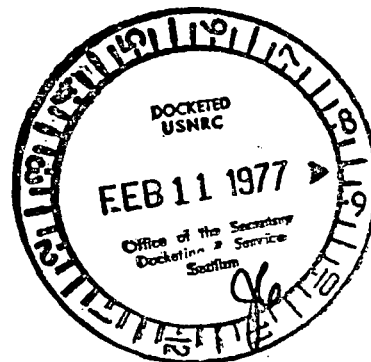
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Mr. Marcus A. Rowden, Chairman
Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Rowden:

Recently your agency has public noticed a proposed amendment to the facility operating license of the Consumers Power Company's Palisades Nuclear Power Plant. Our Department received this document on January 14, 1977, several days after the close of receipt of any requests for a public hearing on this modification.

At this point, our Department has not determined that an official intervention in these proceedings is necessary, however, what does concern me is the manner in which your agency is approaching this problem of limited fuel rod storage capacity at operating reactors. This problem as I see it is not unique to the Palisades facility nor indeed to other facilities in the State of Michigan. The problem is national in scope in that all operating nuclear reactors are presently or shortly will be approaching storage limits for spent fuel elements. This problem has been brought about by lack of approval or development of a commercial reprocessing industry in this country. The solution to this problem that your agency proposes, (i.e., a site by site increase in capacity) may not be the best course of action.

First of all, there are no assurances that reprocessing will be available commercially by the 1985 target date. If this is the case, then the storage capacity will have to be expanded further or the fuel rods shipped to other areas. This latter probability concerns me greatly since the corrosion to the fuel rods after some 14 plus years of storage could seriously impact on safe transportation.

Because of the uncertainties in the waste storage and reprocessing, it is my recommendation that your agency consider this problem on a national level and prepare an EIS which will outline alternative courses of action and the consequences thereof. In this regard, it may be more desirable to transport these fuel rods to a federally operated storage facility for interim storage and subsequent disposal or reprocessing.

Sincerely,

Howard A. Tanner

Howard A. Tanner
Director

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Docket No.s(s) 50-255

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