BEFORE THE ATOMIC SAFETY & LICENSING APPEAL BOADR 1/3/79

Re: Hope Creek Docket Nos. 50-354 & 50-355

Brief by David Caccia on Boards de minimus conclusions on radon.

Presuming that the Board's calculated levels of exposure for radon are correct, I question their de minimus conclusion. This conclusion, as I understand it, states that there will be somewhere between 2 and 132 deaths per millenium from the radon released in conjunction with the Perkins reactor. And, that this is an insignificant amount of deaths.

First, this number of deaths must be multiplied by the number of planned reactors in the country to see the radon impact from the entire nuclear program. These deaths may seem insignificant as a statistic, but as actual people, perhaps members of the Board, how insignificant are they?

Second, the health effects of radon may seem acceptable when compared with the health effects of using coal instead of nuclear. But, if a cost-benefit balance was to be calculated between nuclear and the energy alternatives of solar, co-generation, conservation, etc.,and if the nuclear was debited with the radon health effect, I think the balance would be tipped against nuclear. Indeed, a recent study in Califoria showed the cost-benefit balance to be against nuclear in such a comparison even without including the radon cost.

I point this out, not to raise a new issue, but to point out that a valid cost-benefit comparison should compare the process in question with the best alternative. Recent studies show that the energy alternatives, and not coal is what nuclear should be compared with. If such a study was to be done for Hope Creek, it might find the balance at exact equipoise. In which case, any number of deaths due to the radon would tip the balance against Hope Creek.

At the risk of going beyond the radon issue, I wonder if the cost of de-commissioning Hope Creek has been factored into the cost-benefit calculations?

Respectfully submitted,

David Caccia

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