

July 1, 1981

Director, Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Sir:

I would like to offer the following comment regarding the "Draft Environmental Statement related to the operation of Enrico Fermi Atomic Power Plant, Unit No. 2" NUREG-0769.

I. Demonstrable Need

NEPA requires that alternatives to the proposed action be adequately considered. One such alternative to this plant has been neglected: not adding new production capacity is a prime candidate for recommendation in this DES.

Nearly a 400% error was made in the projected growth rate in peak demand in the Detroit Edison system, to wit a projected figure of 7.9% yearly growth versus the actual 2.1% figure during the years 1970-1980. NUREG-0769 at 7-1. This writer agrees with staff that this trend will likely continue.

For some reason, though, any further analysis of that trend and its concomitant results were omitted from the DES. Charting out more projections for the present decade would undoubtedly spell doom for Fermi 2. This writer expects such a table to reveal a negative growth, which would effectively vitiate the need for an additional 1150 net megawatts electrical.

Staff has circumvented this feature and what little there is to the showing of need rings quite hollow. The timely addition of this unit to Detroit Edison's system will result more probably in prompt consumer rate hikes.

II. Clam Biofouling

Staff has not accounted adequately for the presence of the Asiatic clam Corbicula fluminensis. It is present currently in Lake Erie and both its biofouling capacity and its tolerance to conventional biocides are superior to the organisms Staff did consider (fungal and bacterial growths, DES at 3-7). This writer suggests that both the 513 kg/day chlorine requirements and the dechlorination requirements are invalid.

In conclusion, this writer would request a copy of page 4-4 of the DES, which was incomplete in his copy of the DES. Thank you.

Sincerely,

Robert Alexander
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