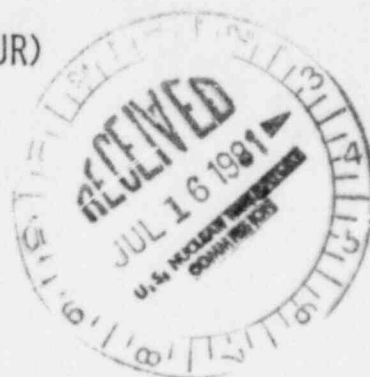


# CITIZENS FOR FAIR UTILITY REGULATION (CFUR)

1668 3 CARTER DRIVE  
ARLINGTON, TEXAS 76010  
July 13, 1981



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

Re: NUREG-0775  
DEIS Comanche Peak

Dear Sir:

CFUR would like to take this opportunity to comment on the two sections of the DEIS that it has examined in detail.

## PURPOSE AND NEED FOR THIS ACTION

1) Table 2.3 presents Capacity Resources, Peak-Hour Demands, and Reserve Margins for TUCS. The last paragraph on page 2-6 indicates that differing projections of demand growth exist. Nevertheless, the NRC Staff has chosen to present outdated data in Table 2.3.

The following figure presents a compilation of projected demands for TUCS obtained by adding together the separate demand projections of each TUCS sister company from their most recent rate increase requests to the Texas Public Utility Commission. As can be noted, these combined demand projections are consistently lower than that presented in the DEIS. By simply adding the separate projections, it is presumed that the individual companies demand projections are coincident - a situation not necessarily true and which tends to overstate the demand projections.

### TUCS PEAK DEMAND PROJECTIONS (MW)

<u>Year</u>	<u>TESCO<sup>1</sup></u>	<u>TPL<sup>2</sup></u>	<u>DPL<sup>3</sup></u>	<u>TOTAL</u>	
1981	4280	5620	2850	12,750	
1982	4495	5910	2950	13,355	1 - Docket 3250 June, 1980
1983	4715	6220	3050	13,985	2 - Docket 3780 Mar., 1981
1984	4945	6560	3150	14,655	3 - Docket 3460 Sept., 1980
1985	5185	6940	3250	15,375	
1986	5435	7320	3350	16,105	

Substitution of these demand projections in Table 2.3 yields the following reserve margins (%).

	<u>WITH COMANCHE PEAK</u>	<u>WITHOUT COMANCHE PEAK</u>
1981	40.8	40.8
1982	41.9	34.1
1983	35.3	27.9
1984	35.0	20.9
1985	36.6	23.1
1986	33.3	20.5

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CFUR recommends that the NRC Staff obtain projections for TUCS made in 1981 to include in the EIS published in 1981.

2) Table 2.2 presents the TUCS Projected Annual Fuel Costs through 1986. The estimated increase in Fuel Price ( $\$/10^6$  BTU) from 1979 to 1986 is 178% for Lignite and 96% for nuclear fuel. No substantiation for this projection is supplied. Lignite (and/or coal) is the more abundant fuel in the U.S.. There is a great deal of uncertainty about the supply of U.S. uranium (Lieberman, "U.S. Uranium Resources - An Analysis of Historical Data", Science, April 30, 1976 and Letters in Science, May 6, 1976). Some measure of independent substantiation would seem to be in order.

On page 2-2, the following appears: "The applicant states that by 1990 it will have fully exploited the lignite deposits of central and eastern Texas." "Further fossil-fuel expansion beyond 1990 will have to be based on coal." Yet the applicant has attempted to sell a lignite facility to Houston Lighting and Power and has just succeeded in selling water from Lake Fork in East Texas (impounded for the purpose of constructing a lignite facility) to the City of Dallas while retaining future options on part of the water rights.

The applicant has purchased a large quantity of coal deposits in New Mexico and has announced preliminary plans for a large coal facility located in Texas near the New Mexico border. In addition, the applicant is engaged in a vigorous development program in an attempt to utilize gas produced in deep-basin lignite deposits in central and eastern Texas.

For these reasons, it appears unreasonable for the staff to conclude that the replacement of any energy not produced by CPSES Units 1 and 2 through 1990 would have to come from lignite and gas in about a 50:50 proportion. If there is any basis for this conclusion, it has materialized through default of alternatives until such time that a remedy is not practical - not because of any overriding need to construct Comanche Peak.

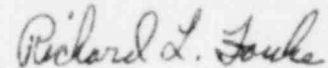
#### PROBABALISTIC ASSESSMENT OF SEVERE ACCIDENTS and DOSE AND HEALTH IMPACTS

1) Table 5.20 presents a Summary of Environmental Impacts and Probabilities. Footnote (a) states that there is only a 30-year period over which Latent Cancer Fatalities might occur. It is not clear from the text whether this 30-year period is an age or disease related period or whether it is the expected period of operation of Comanche Peak (the license request is for 40 years). Clarification would be helpful.

2) Table 5.20 indicates that 2,800/2,800 Latent Cancer fatalities occur at the  $10^{-8}$  probability level. Footnote(b) states that this number (2,800) is related to thyroid cancer fatalities only and that cancer fatalities of all other organs do not contribute. An examination of Figure 5.6 (upon which the table relies) indicates that the graph for Latent Cancer Fatalities excluding Thyroid has not been extended to intersect with the  $10^{-8}$  probability coordinate. CFUR is not aware of any physical phenomena which prohibits this from being done. It appears to CFUR that the conclusion that only Latent Thyroid Cancer Fatalities exist at the  $10^{-8}$  probability level is not correct and should be corrected.

3) CFUR has additional reservations concerning this section but will rely on the intervention process to resolve them.

Sincerely,



Richard L. Fouke