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Secretary, U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Dear Mr. Secretary:

Although comments to the local press by NRC representatives following the February 23 public meeting concerning storage of high level nuclear waste at Pällisades strongly suggest that submission of the following comments is an exercise in futility, I submit them nonetheless.

It is human folly of the highest order for the NRC to persist in applying the administrative rulemaking process to the issue of VSC-24 storage. In no sense can the rulemaking process be characterized as adequate to make this determination. Contrary to the apparent and inexplicable position of the NRC, the VSC-24 cannot reasonably be viewed as a fungible, generic product which can be presently approved without respect to where that device will be used. The Great Lakes Basin is not a fungible system which can be replaced when it is "broken".

My profound concerns are not eased by the NRC's assurances that "it is not unusual" to decline to test "large devices" like the VSC-24 before approving their use. Approval in these circumstances, you tell us, is based on the "analytical submissions of the vendor." That's not good enough, gentlemen.

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Because this is not a generic problem, because it is replete with site-specific concerns, and which carries potential for disaster so vast that it is difficult for the human mind to fully comprehend its contours, the only principled and reasoned approach is to grant this issue a full and formal hearing where the bases of suppositions and conclusions can be stated and examined.

In open, public process is crucial to instill public confidence in the end result. Since the NRC apparently has such great confidence in the proposed storage system and the claims of the vendor, why block the requests by the Attorney General of the State of Michigan and concerned citizens for a formal hearing? If the basis for the proposed generic rule is sound, why not take the opportunity to instill confidence in the public rather than cementing its paranoia? If the basis is sound, surely it will withstand site-specific analysis. If it is not, wouldn't you want to know that? Don't you have the duty to know that before taking irremediable actions? Clearly, your duty lies with the public interest, not the private interests of Consumers Power Co., its parent corporation, and the NRC's vendor.

Set the hearing. Conduct a CBA. Prepare an EIS.

Yours truly,

Maaybelle Putschet